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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

ROLEX WATCH U.S.A., INC.,

Plaintiff,

v.

CHOU WING LOK a/k/a "GARY LOK"  
individually and d/b/a  
WWW.PILOTTWATCH.NET,  
WWW.PILOTTWATCH.COM, and  
"PILOTTWATCH INC.;" UNKNOWN  
WEBSITES 1-10; "JOHN DOES" 1-10; and  
UNKNOWN ENTITIES 1-10

Defendants.

**FILED**  
IN CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.  
★ OCT 23 2009 ★  
CASE NO. 09-4559  
BROOKLYN OFFICE

**COMPLAINT**

**COGAN, J.**

Plaintiff Rolex Watch U.S.A., Inc. ("Rolex"), through its attorneys, complaining of defendants, Chou Wing Lok a/k/a "Gary Lok" individually and d/b/a www.pilottwatch.net, www.pilottwatch.com, and "Pilottwatch Inc."; Unknown Websites 1-10; "John Does" 1-10; and Unknown Entities 1-10 (hereinafter collectively referred to as "Defendants") hereby alleges as follows:

### **STATEMENT OF THE CASE**

1. This is a suit by Rolex against Defendants for injunctive relief, statutory damages, treble damages and/or profits, compensatory damages, pre-judgment interest, attorneys' fees, investigators' fees and costs for trademark counterfeiting, trademark infringement, false designations of origin and false description, dilution and unfair competition under State law. Defendants are being sued by Rolex as a result of Defendants' sale, offers for sale, distribution, promotion and advertisement, over the Internet and through e-mail, of watches bearing counterfeits and infringements of Rolex's federally registered trademarks and for hosting websites that promote for sale and sell watches bearing counterfeits and infringements of the federally registered Rolex trademarks.

### **JURISDICTION AND VENUE**

2. This Court has jurisdiction over the federal trademark claims asserted in this action under 15 U.S.C. § 1121, and 28 U.S.C. § 1331 and 28 U.S.C. § 1338.

3. This Court has supplemental jurisdiction over the claims in this Complaint that arise under state statute and the common law of the State of New York pursuant to 28 U.S.C. § 1367(a), because the state law claims are so related to the federal claims that they form part of the same case or controversy and derive from a common nucleus of operative facts.

4. Defendants are subject to the Court's jurisdiction because they reside and do business in the Eastern District of New York and have committed the acts complained of herein in this District.

5. Defendants are subject to the jurisdiction of this Court pursuant to and in accordance with Rule 4 of the Federal Rules of Civil Procedure.

6. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b).

### PARTIES

7. Rolex is a corporation duly organized and existing under the laws of the State of New York, having an office and principal place of business at 665 Fifth Avenue, New York, New York, 10022.

8. Upon information and belief, defendant Chou Wing Lok a/k/a “Gary Lok” (“Lok”) is a resident of the State of New York residing at 1527 W. 11<sup>th</sup> Street, Apt. 1F, Brooklyn, NY 11204.

9. Upon information and belief, Lok is the registrant, owner, operator, controlling force and/or responsible for the day-to-day operations behind the websites www.pilottwatch.net (“pilottwatch.net”) and www.pilottwatch.com (“pilottwatch.com”). (pilottwatch.net and pilottwatch.com are hereinafter collectively referred to as the “Websites”).

10. Upon information and belief, Lok is the owner, operator and controlling force and/or responsible for the day-to-day operations behind “Pilottwatch Inc.” “Pilottwatch Inc.” is a fictitious business entity that is not authorized to do business in the State of New York. The clandestine operations of Defendants further evidence that their infringement is willful.

11. Upon information and belief, Defendants have established the e-mail addresses pilottwatch@yahoo.com, garylok1025@yahoo.com, and evawatch74@yahoo.com that are used to assist in the distribution of infringing merchandise.

12. The identities of Unknown Websites 1-10, “John Does” 1-10, and Unknown Entities 1-10 are not currently known to Rolex, but, upon information and belief, they are associated with Defendants and contribute to Defendants’ infringements. Rolex will identify these Unknown Websites, Unknown John Does and Unknown Entities upon further knowledge and investigation and will amend its pleadings accordingly.

## **FACTUAL ALLEGATIONS**

### **A. Rolex's Famous Products and Trademarks**

13. Rolex is the exclusive distributor and warrantor in the United States of Rolex watches, all of which bear one or more of the Rolex Registered Trademarks as defined below.

14. Rolex watches are identified by the trade name and trademark ROLEX and one or more of the Rolex Registered Trademarks.

15. Rolex is responsible for assembling, finishing, marketing and selling in interstate commerce high quality Rolex watches, watch bracelets and related products for men and women (hereinafter referred to as "Rolex Watches").


16. Rolex is responsible for maintaining control over the quality of Rolex products and services in this country.

17. Rolex has developed an outstanding reputation because of the uniform high quality of Rolex Watches and the Rolex Registered Trademarks are distinctive marks used to identify these high quality products originating with Rolex.

18. Rolex owns numerous trademarks, including, but not limited to, the trademarks and trade names ROLEX, PRESIDENT, CROWN DEVICE (design), DATEJUST, SEADWELLER, OYSTER, OYSTER PERPETUAL, GMT-MASTER, YACHT-MASTER, SUBMARINER, ROLEX DAYTONA, DAYTONA, EXPLORER II, TURN-O-GRAPH and GMT-MASTER II.

19. Rolex is the owner of, including but not limited to, the following federal trademark registrations in the U.S. Patent and Trademark Office:

<b>Trademark</b>	<b>Reg. No.</b>	<b>Reg. Date</b>	<b>Goods</b>
<b>ROLEX</b>	101,819	1/12/15	Watches, clocks, parts of watches and clocks, and their cases.
<b>PRESIDENT</b>	520,309	1/24/50	Wristbands and bracelets for watches made wholly or in part or plated with precious metals, sold separately from watches.

 <b>CROWN DEVICE</b>	657,756	1/28/58	Timepieces of all kinds and parts thereof.
<b>DATEJUST</b>	674,177	2/17/59	Timepieces and parts thereof.
<b>GMT-MASTER</b>	683,249	8/11/59	Watches.
<b>SEA-DWELLER</b>	860,527	11/19/68	Watches, clocks and parts thereof.
<b>OYSTER</b>	239,383	3/6/28	Watches, movements, cases, dials, and other parts of watches.
<b>OYSTER PERPETUAL</b>	1,105,602	11/7/78	Watches and parts thereof.
<b>YACHT-MASTER</b>	1,749,374	1/26/93	Watches.
<b>SUBMARINER</b>	1,782,604	7/20/93	Watches.
<b>ROLEX DAYTONA</b>	1,960,768	3/5/96	Watches.
<b>DAYTONA</b>	2,331,145	3/21/00	Watches.
<b>EXPLORER II</b>	2,445,357	4/24/01	Watches.
<b>TURN-O-GRAPH</b>	2,950,028	5/10/05	Watches and parts thereof.
<b>GMT-MASTER II</b>	2,985,308	8/16/05	Watches and parts thereof.

Correct and true copies of Rolex's federal trademark registrations (hereinafter collectively referred to as the "Rolex Registered Trademarks") are attached hereto as **Exhibit 1**.

20. The Rolex Registered Trademarks are arbitrary and fanciful and are entitled to the highest level of protection afforded by law.

21. Rolex and its predecessors have used the Rolex Registered Trademarks for many years on and in connection with Rolex Watches and related products.

22. Based on Rolex's extensive advertising, sales and the wide popularity of Rolex products, the Rolex Registered Trademarks are now famous and have been famous since well prior to the activities of the Defendants complained of herein. Rolex Registered Trademarks have acquired secondary meaning so that any product or advertisement bearing such marks is immediately associated by consumers, the public and the trade as being a product or affiliate of Rolex.

23. Rolex has gone to great lengths to protect its name and enforce the Rolex Registered Trademarks.

24. The Rolex Registered Trademarks are valid and subsisting and in full force and effect and have become incontestable pursuant to 15 U.S.C. § 1065, with the exception of TURN-O-GRAPH and GMT MASTER II.

**B. Defendants' Counterfeiting and Infringing Activities**

25. Rolex hereby incorporates all prior allegations by reference.

26. Upon information and belief, long after Rolex's adoption and use of the Rolex Registered Trademarks on its products and after Rolex's federal registration of the Rolex Registered Trademarks, Defendants began selling, offering for sale, distributing, promoting and advertising in interstate commerce, through the Websites, through the Internet and through e-mail, watches bearing counterfeits and infringements of the Rolex Registered Trademarks as those marks appear on Rolex's products and as shown in the Rolex Registered Trademarks attached hereto as **Exhibit 1**.

27. On or about March 2009, Rolex discovered pilottwatch.com which was being used to advertise, distribute, promote, offer for sale and sell watches bearing counterfeits of one or more of the Rolex Registered Trademarks. On Defendants' website these watches were explicitly advertised as "fake Swiss Rolex replica[s]". This website listed the contact e-mail address of garylok1025@yahoo.com. Representative samples of printouts from pilottwatch.com are attached hereto as **Exhibit 2** and incorporated herein by reference.

28. At the time of discovery, pilottwatch.com was registered to "Gary lok [sic], Private Salon" using the e-mail address garylok1025@yahoo.com and the phone number (718) 996-4638. A "Whois" search confirming the registrant information is attached hereto as **Exhibit 3** and incorporated herein by reference.

29. Upon information, belief and investigation, Private Salon, Inc. is a New York corporation that lists Lok as its chairman or chief executive officer. Further, the phone number

(718) 996-4638 is owned by and associated with Lok. Therefore, there can be no doubt but that Lok is the owner and operator of pilottwatch.com.

30. Previously, Lok was identified by Rolex as distributing watches bearing counterfeits of the Rolex Registered Trademarks through the websites, inter alia, www.iOffer.com, www.sell.com, www.eBay.com and www.yahoo.com. Due to these online sales, Rolex's counsel sent Lok several cease and desist letters warning him of the consequences of his trademark counterfeiting and infringement. A representative sample of these letters are attached hereto as **Exhibit 4** and incorporated herein by reference.

31. Due to his expanded infringing activities, on or about April 3, 2009, Rolex's counsel sent another cease and desist letter to Defendants via e-mail to the garylok1025@yahoo.com address warning them of the consequences of their trademark counterfeiting and infringement. A copy of this letter is attached hereto as **Exhibit 5** and incorporated herein by reference.

32. On or about April 9, 2009, Rolex's counsel received a response from "Chou Lok" at garylok1025@yahoo.com stating in part that "there were no webpage content related to the unlawful use of rolex (sic) trademarks on pilottwatch.com."

33. Sometime thereafter pilottwatch.com became inactive, however the domain name remains registered to Lok.

34. On or about August 2009, Rolex discovered pilottwatch.net which was being used to advertise, distribute, promote, offer for sale and sell watches bearing counterfeits of one or more of the Rolex Registered Trademarks. On Defendants' website these watches are explicitly advertised as replicas. Representative samples of printouts from pilottwatch.net are attached hereto as **Exhibit 6** and incorporated herein by reference.

35. At the time of discovery, pilottwatch.net was registered to “gary (sic) Lok, Pilottwatch Inc., 106 Mott, New York, NY 10013.” A “Whois” search confirming the registrant information is attached hereto as **Exhibit 7** and incorporated herein by reference.

36. Upon information, belief and investigation, Lok’s corporation Private Salon, Inc. is located at 106 Mott Street. Therefore there can be no doubt but that Lok is the owner and operator of pilottwatch.net.

37. Thereafter, Rolex further discovered that Defendants are using the website www.youtube.com to advertise pilottwatch.net, which advertisements contain depictions of watches bearing counterfeits and infringements of the Rolex Registered Trademarks.

38. On or about September 6, 2009, Rolex’s investigator placed an order for a “Rolex Datejust (blue)” (\$199.00) from pilottwatch.net. Rolex’s investigator purchased the watch using PayPal. At this time, Rolex’s investigator received an e-mail from PayPal confirming payment for the purchase of the watch was made to “Chou W Lok” at the e-mail address evawatch74@yahoo.com.

39. On or about September 7, 2009, Rolex’s investigator received an e-mail from “Chou Lok” at evawatch74@yahoo.com inquiring whether it was permissible if he shipped a different color watch than what was ordered. Rolex’s investigator agreed to accept a black model watch.

40. On or about September 10, 2009, Rolex’s investigator received a package containing a watch bearing counterfeits of the Rolex Registered Trademarks (“Counterfeit Watch”). The return address on the package was “Chou W Lok, 1527 w 11st. Apt. 1F, Brooklyn, NY 11204.” Digital images of the Counterfeit Watch and packaging are attached hereto as **Exhibit 8** and incorporated herein by reference.



41. Rolex's representative has examined the Counterfeit Watch and determined that none of its parts including the dial, bracelet, link, bezel and movement are of Rolex origin. The Counterfeit Watch contains numerous counterfeits and infringements of the Rolex Registered Trademarks.

42. On or about September 30, 2009, Rolex's counsel sent another cease and desist letter to Defendants via First Class Mail and e-mail to [pilottwatches@yahoo.com](mailto:pilottwatches@yahoo.com), an e-mail address listed on the [pilottwatch.net](http://pilottwatch.net) website, further warning Defendants of the consequences of their continued infringement of the Rolex Registered Trademarks. A copy of this letter is attached hereto as **Exhibit 9** and incorporated herein by reference.

43. To date, despite receiving several cease and desist letters, Defendants continue to offer for sale and sell watches bearing counterfeits of the Rolex Registered Trademarks on [pilottwatch.net](http://pilottwatch.net).

### **C. Summary of Defendants' Illegal Activities**

44. Defendants intentionally, maliciously and willfully sold, offered for sale, distributed, promoted and advertised watches bearing counterfeits of one or more of the Rolex Registered Trademarks, despite knowledge that such sales were illegal.

45. The Defendants' acts were calculated to confuse and to deceive the public and are performed with full knowledge of Rolex's rights.

46. Defendants are not now, nor have they ever been, associated, affiliated, connected with, endorsed or sanctioned by Rolex.

47. Rolex has never authorized or consented in any way to the use by Defendants of the Rolex Registered Trademarks or marks confusingly similar thereto.

48. The use by Defendants of the Rolex Registered Trademarks or marks substantially indistinguishable and/or confusingly similar thereto in connection with Defendants'

products is likely to cause consumers, the public and the trade to erroneously believe that the products provided by Defendants emanate or originate from Rolex, and/or that said products are authorized, sponsored, or approved by Rolex, even though they are not. This confusion causes irreparable harm to Rolex and weakens and dilutes the distinctive quality of the Rolex Registered Trademarks.

49. By using counterfeits and infringements of the Rolex Registered Trademarks on their goods, Defendants are trading on the goodwill and reputation of Rolex and creating the false impression that Defendants' goods are affiliated with Rolex.

50. Defendants have been unjustly enriched by illegally using and misappropriating Rolex's intellectual property for their own financial gain. Furthermore, Defendants have unfairly benefited and profited from Rolex's outstanding reputation for high quality products and its significant advertising and promotion of Rolex watches and the Rolex Registered Trademarks.

51. Defendants have disparaged Rolex, its Rolex Registered Trademarks and its products by creating a false association with Rolex, its genuine goods and its Rolex Registered Trademarks.

52. Rolex has no control over the nature and quality of the products sold by Defendants, which bear counterfeits and infringements of the Rolex Registered Trademarks.

53. Among other things, Defendants' promotion, advertisement and provision of its goods have and will reflect adversely on Rolex as the believed source of origin thereof; hamper continuing efforts by Rolex to protect its outstanding reputation for high quality, originality and distinctive goods; and tarnish the goodwill and demand for genuine Rolex watches and products.

54. Upon information and belief, Defendants have acted with reckless disregard for Rolex's rights and/or were willfully blind in connection with unlawful activities. Upon

information and belief, Defendants have willfully and maliciously engaged in infringing activities. Therefore, this case constitutes an exceptional case under 15 U.S.C. § 1117(a).

55. Rolex has suffered irreparable harm and damages as a result of Defendants' conduct. The injuries and damages sustained by Rolex have been directly and proximately caused by the Defendants' wrongful advertisement, promotion, distribution, sale and offers of sale of their goods bearing counterfeits and/or infringements of the Rolex Registered Trademarks.

56. Rolex has no adequate remedy at law.

57. Defendants' wrongful acts will continue unless enjoined by the Court. Accordingly, Defendants must be restrained and enjoined from any further counterfeiting or infringement of the Rolex Registered Trademarks.

**FIRST CLAIM FOR RELIEF**  
**(Trademark Counterfeiting, 15 U.S.C. § 1114)**

58. Rolex hereby incorporates by reference all prior allegations as though fully set forth herein.

59. Defendants have used spurious designations that are identical with, or substantially indistinguishable from, the Rolex Registered Trademarks on goods covered by registrations for the Rolex Registered Trademarks.

60. Defendants have intentionally used these spurious designations, knowing they are counterfeit, in connection with the advertisement, promotion, sale, offering for sale and distribution of goods.

61. Defendants' use of the Rolex Registered Trademarks to advertise, promote, offer for sale, distribute and sell watches bearing counterfeits was and is without the consent of Rolex.

62. Defendants' unauthorized use of the Rolex Registered Trademarks on and in connection with their advertisement, promotion, sale, offering for sale and distribution of watches through e-mail and through the Internet constitutes Defendants' use of the Rolex Registered Trademarks in commerce.

63. Defendants' unauthorized use of the Rolex Registered Trademarks as set forth above is likely to:

- (a) cause confusion, mistake and deception;
- (b) cause the public to believe that their watches are the same as Rolex's watches and/or that they are authorized, sponsored or approved by Rolex or that they are affiliated, connected or associated with or in some way related to Rolex; and
- (c) result in Defendants unfairly benefiting from Rolex's advertising and promotion and profiting from the reputation of Rolex and its Rolex Registered Trademarks all to the substantial and irreparable injury of the public, Rolex and the Rolex Registered Trademarks and the substantial goodwill represented thereby.

64. Defendants' acts constitute willful trademark counterfeiting in violation of Section 32 of the Lanham Act, 15 U.S.C. § 1114.

65. By reason of the foregoing, Defendants are liable to Rolex for: (a) statutory damages in the amount of up to \$2,000,000 for each mark counterfeited as provided by 15 U.S.C. § 1117(c) of the Lanham Act, or, at Rolex's election, an amount representing three (3) times Rolex's damages and/or Defendants' illicit profits; and (b) reasonable attorneys' fees, investigative fees and pre-judgment interest pursuant to 15 U.S.C. § 1117(b).

**SECOND CLAIM FOR RELIEF**  
**(Trademark Infringement, 15 U.S.C. § 1114)**

66. Rolex hereby incorporates by reference all prior allegations as though fully set forth herein.

67. Based on Rolex's extensive advertising under the Rolex Registered Trademarks, its extensive sales and the wide popularity of Rolex Watches, the Rolex Registered Trademarks have acquired a secondary meaning so that any product and advertisement bearing such trademarks is immediately associated by purchasers and the public as being a product and affiliate of Rolex.

68. Defendants' activities constitute Defendants' use in commerce of the Rolex Registered Trademarks. Defendants use the Rolex Registered Trademarks in connection with Defendants' sale, offers of sale, distribution, promotion and advertisement of their goods bearing infringements and/or counterfeits of the Rolex Registered Trademarks.

69. Defendants have used the Rolex Registered Trademarks, knowing they are the exclusive property of Rolex, in connection with their sale, offers for sale, distribution, promotion and advertisement of their goods bearing counterfeits or infringements of the Rolex Registered Trademarks.

70. Defendants' activities create the false and misleading impression that Defendants are sanctioned, assigned or authorized by Rolex to use the Rolex Registered Trademarks to advertise, manufacture, distribute, appraise, offer for sale or sell watches bearing the Rolex Registered Trademarks when Defendants are not so authorized.

71. Defendants engage in the aforementioned activity with the intent to confuse and deceive the public into believing that they and the watches they sell are in some way sponsored, affiliated or associated with Rolex, when in fact they are not.

72. Defendants' use of the Rolex Registered Trademarks has been without the consent of Rolex, is likely to cause confusion and mistake in the minds of the public and, in particular, tends to and does falsely create the impression that the goods advertised, promoted, distributed and sold by Defendants are warranted, authorized, sponsored or approved by Rolex when, in fact, they are not.

73. Defendants' unauthorized use of the Rolex Registered Trademarks has resulted in Defendants unfairly benefiting from Rolex's advertising and promotion, and profiting from the reputation of Rolex and the Rolex Registered Trademarks, to the substantial and irreparable injury of the public, Rolex and the Rolex Registered Trademarks and the substantial goodwill represented thereby.

74. Defendants' acts constitute willful trademark infringement in violation of Section 32 of the Lanham Act, 15 U.S.C. § 1114.

75. By reason of the foregoing, Defendants are liable to Rolex for: (a) an amount representing three (3) times Rolex's damage and/or their illicit profits; and (b) reasonable attorney's fees, investigative fees and pre-judgment interest pursuant to 15 U.S.C. § 1117.

**THIRD CLAIM FOR RELIEF**  
**(Federal Trademark Dilution, 15 U.S.C. §1125(c))**

76. Rolex hereby incorporates by reference all prior allegations as though fully set forth herein.

77. Defendants' use of the Rolex Registered Trademarks or marks confusingly similar thereto in order to sell their products constitutes Defendants' commercial use in commerce of the Rolex Registered Trademarks.

78. The Rolex Registered Trademarks are world famous and distinctive.

79. Defendants' use of the Rolex Registered Trademarks to advertise unauthorized merchandise constitutes tarnishment of the Rolex Registered Trademarks.

80. Rolex is suffering and will continue to suffer irreparable harm from the Defendants' dilutive activities.

81. Defendants' acts as aforesaid are diluting the distinctive quality of the Rolex Registered Trademarks in violation of Section 43(c) of the Lanham Act, 15 U.S.C. § 1125(c).

82. Defendants have intentionally and willfully appropriated the Rolex Registered Trademarks and traded on Rolex's reputation.

83. Defendants' wrongful acts of dilution will continue unless enjoined by this Court.

#### **FOURTH CLAIM FOR RELIEF**

**(Unfair Competition, False Designation of Origin & False Description, 15 U.S.C. § 1125(a))**

84. Rolex hereby incorporates by reference all prior allegations as though fully set forth herein.

85. In connection with Defendants' advertisement, promotion, distribution, offers of sale and sale of their goods, Defendants have used the Rolex Registered Trademarks in commerce.

86. In connection with Defendants' advertisement, promotion, distribution, offers of sales and sales of their goods, Defendants have affixed, applied and/or used false designations of origin and false and misleading descriptions and representations, including the ROLEX trademark and other Rolex Registered Trademarks, which tend falsely to describe the origin, sponsorship, association or approval by Rolex of the goods Defendants sell.

87. Defendants have used the Rolex Registered Trademarks with full knowledge of the falsity of such designations of origin, descriptions and representations, all to the detriment of Rolex.

88. Defendants' use of the Rolex Registered Trademarks on the Websites and on their goods bearing counterfeits or infringements of the Rolex Registered Trademarks constitutes false descriptions and representations tending falsely to describe or represent Defendants and their products as being authorized, sponsored, affiliated or associated with Rolex.

89. Defendants have used the Rolex Registered Trademarks on their Websites and on their goods with the express intent to cause confusion and mistake, to deceive and mislead the public, to trade upon the reputation of Rolex and to improperly appropriate to themselves the valuable trademark rights of Rolex. Defendants' acts constitute unfair competition under federal law.

90. Defendants' acts constitute the use in commerce of false designations of origin and false and/or misleading descriptions or representations, tending to falsely or misleadingly describe and/or represent their products as those of Rolex in violation of Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a). These acts constitute unfair competition.

**FIFTH CLAIM FOR RELIEF**  
**(Unfair Competition Under the Common Law)**

91. Rolex hereby incorporates by reference the allegations set forth above.

92. This is a claim against Defendants for unfair competition under the laws of the State of New York.

93. Rolex has built up valuable goodwill in its Rolex Registered Trademarks and the distinctive appearance of its watches and other products.



94. Defendants' use of the Rolex Registered Trademarks is likely to and does permit Defendants to pass off their products as those of Rolex, all to the detriment of Rolex and the unjust enrichment of Defendants.

95. Upon information and belief, Defendants, with full knowledge of the notoriety of the Rolex Registered Trademarks, intended to and did trade on the goodwill associated with the Rolex Registered Trademarks and has misled and will continue to mislead the public into assuming a connection between Rolex and Defendants' goods by Defendants' advertisement, promotion, distribution, and provision of services using marks that are confusingly similar to the Rolex Registered Trademarks.

96. Defendants' unauthorized use of the Rolex Registered Trademarks has caused and is likely to continue to cause damage to Rolex's valuable reputation and image associated with Rolex and its goods. Defendants have passed off their goods as those of Rolex by Defendants' misrepresentations to the public, members of which are likely to believe that Defendants' watches emanate from, or are associated with, Rolex.

97. Defendants' acts are likely to have caused confusion and deceived the public as to the source of Defendants' goods. Defendants' goods falsely suggest a connection with Rolex.

98. Defendants' conduct constitutes unfair competition in violation of New York common law.

99. Upon information and belief, Defendants' actions have been willful and malicious.

100. By reason of the foregoing, Defendants are liable to Rolex for compensatory damages and/or Defendants' illicit profits.

**PRAYER FOR RELIEF**

**WHEREFORE**, Rolex respectfully requests that the Court order the following relief:

I. That the Court enter an injunction ordering that Defendants, their agents, servants, employees, and all other persons in privity or acting in concert with them be enjoined and restrained from:

(a) using any reproduction, counterfeit, copy, or colorable imitation of the Rolex Registered Trademarks to identify any goods or the rendering of any services not authorized by Rolex;

(b) engaging in any course of conduct likely to cause confusion, deception or mistake, or injure Rolex's business reputation or weaken the distinctive quality of the Rolex Registered Trademarks, Rolex's name, reputation or goodwill;

(c) using a false description or representation including words or other symbols tending to falsely describe or represent their unauthorized goods as being those of Rolex or sponsored by or associated with Rolex and from offering such goods in commerce;

(d) further infringing or diluting the Rolex Registered Trademarks by manufacturing, producing, distributing, circulating, selling, marketing, offering for sale, advertising, promoting, displaying or otherwise disposing of any products not authorized by Rolex bearing any simulation, reproduction, counterfeit, copy or colorable imitation of the Rolex Registered Trademarks;

(e) using any simulation, reproduction, counterfeit, copy or colorable imitation of the Rolex Registered Trademarks in connection with the promotion, advertisement, display, sale, offering for sale, manufacture, production, circulation or distribution of any unauthorized products in such fashion as to relate or connect, or tend to relate or connect, such products in any way to Rolex, or to any goods sold, manufactured, sponsored or approved by, or connected with Rolex;

(f) making any statement or representation whatsoever, or using any false designation of origin or false description, or performing any act, which can or is likely to lead the trade or public, or individual members thereof, to believe that any services provided, products manufactured, distributed, sold or offered for sale, or rented by Defendants are in any way associated or connected with Rolex, or is provided, sold, manufactured, licensed, sponsored, approved or authorized by Rolex;

- (g) engaging in any conduct constituting an infringement of any of the Rolex Registered Trademarks, of Rolex's rights in, or to use or to exploit, said trademark, or constituting any weakening of Rolex's name, reputation and goodwill;
- (h) using or continuing to use the Rolex Registered Trademarks or trade names in any variation thereof on the Internet (either in the text of a website, as a domain name, or as a keyword, search word, metatag, or any part of the description of the site in any submission for registration of any Internet site with a search engine or index) in connection with any goods or services not directly authorized by Rolex;
- (i) hosting or acting as Internet Service Provider for, or operating or engaging in the business of selling any website or other enterprise that offers for sale any products bearing the Rolex Registered Trademarks;
- (j) acquiring, registering, maintaining or controlling any domain names that include the ROLEX trademark or any of the other Rolex Registered Trademarks or any marks confusingly similar thereto, activating any website under said domain names, or selling, transferring, conveying, or assigning any such domain names to any entity other than Rolex;
- (k) using any e-mail addresses to offer for sale any nongenuine products bearing counterfeits of the Rolex Registered Trademarks;
- (l) having any connection whatsoever with any websites that offer for sale any merchandise bearing counterfeits of the Rolex Registered Trademarks;
- (m) secreting, destroying, altering, removing, or otherwise dealing with the unauthorized products or any books or records which contain any information relating to the importing, manufacturing, producing, distributing, circulating, selling, marketing, offering for sale, advertising, promoting, or displaying of all unauthorized products which infringe the Rolex Registered Trademarks; and
- (n) effecting assignments or transfers, forming new entities or associations or utilizing any other device for the purpose of circumventing or otherwise avoiding the prohibitions set forth in subparagraphs (a) through (m).

II. That Defendants, within ten (10) days of judgment, take all steps necessary to remove from all websites owned, operated or controlled by the Defendants, all text or other media offering for sale any merchandise bearing the Rolex Registered Trademarks, or marks substantially indistinguishable therefrom.

III. That Defendants, within thirty (30) days of judgment, file and serve Rolex with a sworn statement setting forth in detail the manner and form in which they have complied with this injunction pursuant to 15 U.S.C. § 1116(a).

IV. That Defendants be required to deliver up for destruction to Rolex all unauthorized materials bearing any of the Rolex Registered Trademarks in association with unauthorized goods or services and the means for production of same pursuant to 15 U.S.C. § 1118.

V. That Defendants not operate any websites that offer for sale and/or sell any merchandise bearing counterfeits of the Rolex Registered Trademarks.

VI. Requiring Defendants to pay to Rolex such damages Rolex has sustained as a consequence of their counterfeiting and infringement of the Rolex Registered Trademarks and to account for all gains, profits and advantages derived by Defendants from the sale of their infringing merchandise bearing the Rolex Registered Trademarks, and that the award to Rolex be trebled as provided for under 15 U.S.C. § 1117; alternatively, that Rolex be awarded statutory damages pursuant to 15 U.S.C. § 1117(c) of up to \$2,000,000 for each trademark that Defendants have willfully counterfeited and infringed.

VII. Ordering that Rolex recover the costs of this action, together with reasonable attorneys' and investigators' fees and pre-judgment interest in accordance with 15 U.S.C. § 1117.

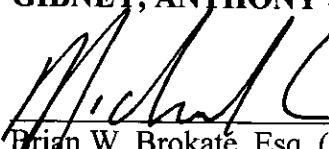
VIII. Directing that this Court retain jurisdiction of this action for the purpose of enabling Rolex to apply to the Court at any time for such further orders and interpretation or execution of any Order entered in this action, for the modification of any such Order, for the enforcement or compliance therewith and for the punishment of any violations thereof.

IX. Ordering that pursuant to 11 U.S.C. § 523(a)(6), Defendants be prohibited from a discharge under 11 U.S.C. § 727 for malicious, willful and fraudulent injury to Rolex.

X. Awarding to Rolex such other and further relief as the Court may deem just and proper, together with the costs and disbursements that Rolex has incurred in connection with this action.

**GIBNEY, ANTHONY & FLAHERTY, LLP**

Dated: Oct. 23, 2009



Brian W. Brokaté, Esq. (BB 5830)  
John Macaluso, Esq. (JM 2058)  
Walter-Michael Lee, Esq. (WL 6353)  
665 Fifth Avenue  
New York, NY 10022  
Telephone: (212) 688-5151  
Facsimile: (212) 688-8315

Attorneys for Plaintiff Rolex Watch U.S.A., Inc.



1300098

# THE UNITED STATES OF AMERICA

**TO ALL TO WHOM THESE PRESENTS SHALL COME:**

**UNITED STATES DEPARTMENT OF COMMERCE**

**United States Patent and Trademark Office**

March 28, 2005

THE ATTACHED U.S. TRADEMARK REGISTRATION 101,819 IS  
CERTIFIED TO BE A TRUE COPY WHICH IS IN FULL FORCE AND  
EFFECT WITH NOTATIONS OF ALL STATUTORY ACTIONS TAKEN  
THEREON AS DISCLOSED BY THE RECORDS OF THE UNITED STATES  
PATENT AND TRADEMARK OFFICE.

REGISTERED FOR A TERM OF 20 YEARS FROM *January 12, 1915*

5th RENEWAL FOR A TERM OF 10 YEARS FROM *January 12, 2005*

SECTION 8 & 15

REPUBLISHED SECTION 12C

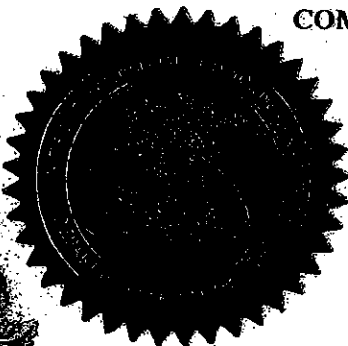
SAID RECORDS SHOW TITLE TO BE IN:

*ROLEX WATCH U.S.A. INC.*

*A NY CORP*

By Authority of the

COMMISSIONER OF PATENTS AND TRADEMARKS



T. LAWRENCE  
Certifying Officer

Int. Cl.: 14

Prior U.S. Cl.: 27

United States Patent and Trademark Office

10 Year Renewal

Reg. No. 101,819

Registered Jan. 12, 1915

Renewal Term Begins Jan. 12, 1995

TRADEMARK  
PRINCIPAL REGISTER

**ROLEX**

ROLEX WATCH U.S.A., INC. (NEW  
YORK CORPORATION)  
665 FIFTH AVENUE  
NEW YORK, NY 10022, BY CHANGE OF  
NAME AND ASSIGNMENT FROM  
ROLEX S. A. (SWITZERLAND COM-  
PANY) BIENNE, SWITZERLAND

OWNER OF SWITZERLAND REG.  
NO. 34251, DATED 10-7-1913.

FOR: WATCHES, CLOCKS, PARTS OF  
WATCHES AND CLOCKS, AND THEIR  
CASES, IN CLASS 27 (INT. CL. 14).

FIRST USE 0-6-1912; IN COMMERCE  
0-0-1912.

SER. NO. 71-074,904, FILED 6-8-1914.

*In testimony whereof I have hereunto set my hand  
and caused the seal of The Patent and Trademark  
Office to be affixed on Nov. 8, 1994.*

COMMISSIONER OF PATENTS AND TRADEMARKS



Renewed to  
Aegler, S.A., Fabrique des Montres Rolex & Gruen Guild A, a  
corporation of Switzerland.

## UNITED STATES PATENT OFFICE.

AEGLER S. A., OF BIENNE, SWITZERLAND.

TRADE-MARK FOR WATCHES, CLOCKS, PARTS OF WATCHES AND CLOCKS, AND THEIR  
CASES.

101,819.

Registered Jan. 12, 1915.

Application filed June 8, 1914. Serial No. 78,904.

### STATEMENT.

*To all whom it may concern:*

Be it known that AEGLER S. A., a company registered in Switzerland under Swiss law, and located in Bienne, Switzerland, doing business at Rebberg Works, Höheweg 82 and 82\*, Bienne, Switzerland, has adopted and used the trade-mark shown in the accompanying drawing, for watches, clocks, parts of watches and clocks, and their cases, in Class 27, Horological instruments:

The trade mark has been continuously used

in the business of the said company since the year 1912.

The trade mark is applied or affixed to the goods or to the packages containing same by placing thereon a printed label on which the trade mark is shown; it is also stamped directly on the goods.

AEGLER S. A.  
HERMAN AEGLER,  
*Director.*

## ROLEX

### DECLARATION.

Confederation of Switzerland. Canton and city of Berne ss.

HERMAN AEGLER, being duly sworn deposes and says that he is the director of the company, the applicant named in the foregoing statement; that he believes the foregoing statement is true; that he believes the said company is the owner of the trade mark sought to be registered; that no other person, firm, corporation or association, to the best of his knowledge and belief, has the right to use said trade mark in the United States, either in the identical form or in any such near resemblance thereto as

might be calculated to deceive; (that said trade mark has been registered in Switzerland on the 7th October 1913 No. 34251); that the description and drawing presented truly represent the trade mark sought to be registered; and that the facsimiles show the trade mark as actually used upon the goods.

HERMAN AEGLER.

Subscribed and sworn to before me this 20th day of May, 1914.

[L. s.] GEO. HEIMROD,  
*Consul of the United States of America at  
Berne, Switzerland.*

Copies of this trade-mark may be obtained for five cents each, by addressing the "Commissioner of Patents,  
Washington, D. C."

1380098

# THE UNITED STATES OF AMERICA

~~TO ALL TO WHOM THESE PRESENTS SHALL COME:~~

UNITED STATES DEPARTMENT OF COMMERCE

United States Patent and Trademark Office

March 29, 2005

THE ATTACHED U.S. TRADEMARK REGISTRATION 520,309 IS  
CERTIFIED TO BE A TRUE COPY WHICH IS IN FULL FORCE AND  
EFFECT WITH NOTATIONS OF ALL STATUTORY ACTIONS TAKEN  
THEREON AS DISCLOSED BY THE RECORDS OF THE UNITED STATES  
PATENT AND TRADEMARK OFFICE.

REGISTERED FOR A TERM OF 20 YEARS FROM *January 24, 1950*  
3rd RENEWAL FOR A TERM OF 10 YEARS FROM *January 24, 2000*  
SECTION 8 & 15

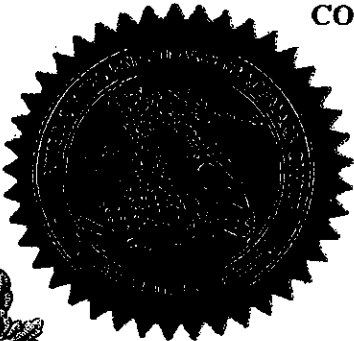
LESS GOODS

SAID RECORDS SHOW TITLE TO BE IN:

*ROLEX WATCH U.S.A., INC.*

*A NEW YORK CORPORATION*

By Authority of the  
COMMISSIONER OF PATENTS AND TRADEMARKS



P. SWAIN

Certifying Officer

Int. Cl. 14

Prior U.S. Cl. 28

Reg. No. 528,309

United States Patent and Trademark Office

Registered Jan. 24, 1950

10 Year Renewal

Renewal Term Begins Jan. 24, 2000

TRADEMARK  
PRINCIPAL REGISTER

President

ROLEX WATCH U.S.A., INC. (NEW  
YORK CORPORATION)  
663 FIFTH AVENUE  
NEW YORK, NY 10022, BY ASSIGN-  
MENT BULOVA WATCH COMPANY,  
INC. (NEW YORK CORPORATION)  
NEW YORK, NY

OWNER OF U.S. REG. NO. 223,259.

FOR: WRISTBANDS AND BRACE-  
LETS FOR WATCHES MADE WHOLLY  
OR IN PART OR PLATED, WITH PRE-  
CIOUS METALS [SOLD SEPARATELY  
FROM WATCHES], IN CLASS 21 (INT.  
CL. 14).

FIRST USE 1-3-1949; IN COMMERCE  
1-3-1949.

SER. NO. 71-373,640, FILED 2-10-1949.

*In testimony whereof I have hereunto set my hand  
and caused the seal of The Patent and Trademark  
Office to be affixed on Dec. 7, 1999.*

COMMISSIONER OF PATENTS AND TRADEMARKS

Registered Jan. 24, 1950

Registration No. 520,309

AFFIDAVIT SEC. 8

ACCEPTED

RENEWED

PRINCIPAL REGISTER

Trade-Mark

*Ex. Add.  
F. Henshel, N.Y.*

## UNITED STATES PATENT OFFICE

Bulova Watch Company, Inc., New York, N. Y.

Act of 1946

Application February 10, 1949, Serial No. 573,640

President

### (Statement)

Bulova Watch Company, Inc., a corporation duly organized under the laws of the State of New York, located and doing business at No. 630 Fifth Avenue, in the city of New York, State of New York, United States of America, has adopted and is using the trade-mark shown in the accompanying drawing, for WRISTBANDS AND BRACELETS FOR WATCHES MADE WHOLLY OR IN PART OR PLATED WITH PRECIOUS METALS, SOLD SEPARATELY FROM WATCHES, in Class 28, Jewelry and precious-metal ware, and presents herewith five specimens showing the trade-mark as actually used in connection with such goods, the trade-mark being applied to tag-labels affixed to the goods, and requests that the same be registered in the United States Patent Office on the Principal Register in accordance with the act of July 5, 1946.

The trade-mark was first used on January 5, 1949, and first used in commerce among the several States of the United States which may lawfully be regulated by Congress, on January 5, 1949.

Applicant is the owner of United States Trade-Mark Registration No. 223,259, registered January 25, 1927, renewed.

### (Declaration)

Harry D. Henshel, being duly sworn, deposes and says that he is vice president of Bulova Watch Company, Inc., the applicant named in the foregoing statement, that he believes that said corporation is the owner of the trade-mark which is in use in commerce among the several States of the United States, and that no other person, firm, corporation or association, to the best of his knowledge and belief, has the right to use such trade-mark in commerce which may lawfully be regulated by Congress either in the identical form thereof or in such near resemblance thereto as might be calculated to deceive, that the drawing and description truly represent the trade-mark sought to be registered, that the specimens show the trade-mark as actually used in connection with the goods, and that the facts set forth in the statement are true.

BULOVA WATCH COMPANY, INC.,  
By HARRY D. HENSHEL,  
Vice President.

1300098

# THE UNITED STATES OF AMERICA

~~TO ALL TO WHOM THESE PRESENTS SHALL COME:~~

UNITED STATES DEPARTMENT OF COMMERCE

United States Patent and Trademark Office

March 31, 2005

THE ATTACHED U.S. TRADEMARK REGISTRATION 657,756 IS  
CERTIFIED TO BE A TRUE COPY WHICH IS IN FULL FORCE AND  
EFFECT WITH NOTATIONS OF ALL STATUTORY ACTIONS TAKEN  
THEREON AS DISCLOSED BY THE RECORDS OF THE UNITED STATES  
PATENT AND TRADEMARK OFFICE.

REGISTERED FOR A TERM OF 20 YEARS FROM *January 28, 1958*  
2nd RENEWAL FOR A TERM OF 10 YEARS FROM *January 28, 1998*  
SECTION 8 & 15

SAID RECORDS SHOW TITLE TO BE IN:

*ROLEX WATCH U.S.A., INC.*

By Authority of the  
COMMISSIONER OF PATENTS AND TRADEMARKS



P. SWAIN  
Certifying Officer

Int. Cl.: 14

Prior U.S. Cl.: 27

United States Patent and Trademark Office.

10 Year Renewal

Reg. No. 657,756

Registered Jan. 28, 1958

Renewal Term Begins Jan. 28, 1998

**TRADEMARK  
PRINCIPAL REGISTER**



ROLEX WATCH U.S.A., INC. (NEW  
YORK CORPORATION)  
665 FIFTH AVENUE

NEW YORK, NY 10022, ASSIGNEE OF  
MONTRES ROLEX S. A. (ROLEX  
WHOLESALE CO.) (ROLEX WATCH CO.  
LTD.) (SWITZERLAND CORPORA-  
TION) GENEVA, SWITZERLAND

FOR: TIMEPIECES OF ALL KINDS  
AND PARTS THEREOF, IN CLASS 27  
(INT. CL. 14).

FIRST USE 1-15-1941; IN COMMERCE  
6-1-1941.

SER. NO. 72-027,385, FILED 4-2-1957.

*In testimony whereof I have hereunto set my hand  
and caused the seal of The Patent and Trademark  
Office to be affixed on Feb. 3, 1998.*

COMMISSIONER OF PATENTS AND TRADEMARKS

# United States Patent Office

657,756

Registered Jan. 28, 1958

AFFIDAVIT SEC. 8  
ACCEPTED

PRINCIPAL REGISTER  
Trademark

AFFIDAVIT SEC. 15  
RECEIVED 3-11-63

Des. No. 27,388, Issued April 2, 1957



Jaume Riera S. A. (Riera Uhren Ag.), (Riera Watch  
Co. Ltd.), (Swiss corporation)  
1, rue de Marche  
Geneve, Switzerland

For: TRADEPIECES OF ALL KINDS AND PARTS  
THEREOF, in CLASS 27.  
Filed Jan. 15, 1941; in commerce June 1, 1941.



1300101



# THE UNITED STATES OF AMERICA

~~TO ALL TO WHOM THESE PRESENTS SHALL COME:~~

UNITED STATES DEPARTMENT OF COMMERCE  
United States Patent and Trademark Office

March 31, 2005

THE ATTACHED U.S. TRADEMARK REGISTRATION 674,177 IS  
CERTIFIED TO BE A TRUE COPY WHICH IS IN FULL FORCE AND  
EFFECT WITH NOTATIONS OF ALL STATUTORY ACTIONS TAKEN  
THEREON AS DISCLOSED BY THE RECORDS OF THE UNITED STATES  
PATENT AND TRADEMARK OFFICE.

REGISTERED FOR A TERM OF 20 YEARS FROM *February 17, 1959*  
2nd RENEWAL FOR A TERM OF 10 YEARS FROM *February 17, 1999*  
SECTION 8 & 15

SAID RECORDS SHOW TITLE TO BE IN:

*ROLEX WATCH, U.S.A., INC.*

By Authority of the  
COMMISSIONER OF PATENTS AND TRADEMARKS



*L. Edelen*

L. EDELEN  
Certifying Officer



Int. Cl.: 14

Prior U.S. Cl.: 27

United States Patent and Trademark Office

10 Year Renewal

Reg. No. 674,177

Registered Feb. 17, 1959

Renewal Term Begins Feb. 17, 1999

**TRADEMARK  
PRINCIPAL REGISTER**

**DATEJUST**

ROLEX WATCH U.S.A., INC. (NEW  
YORK CORPORATION)  
635 FIFTH AVENUE  
NEW YORK, NY 10022, ASSIGNEE OF  
MONTRES ROLEX S. A. (ROLEX  
UHREN AG.) (ROLEX WATCH CO.  
LTD.) (SWITZERLAND CORPORA-  
TION) GENEVA, SWITZERLAND

FOR: TIME-PIECES AND PARTS  
THEREOF, IN CLASS 27 (INT. CL. 14)

FIRST USE 0-0-1953; IN COMMERCE  
0-0-1953.

SER. NO. 72-053,420, FILED 6-12-1958.

*In testimony whereof I have hereunto set my hand  
and caused the seal of The Patent and Trademark  
Office to be affixed on Mar. 16, 1999.*

COMMISSIONER OF PATENTS AND TRADEMARKS

# United States Patent Office

674,177

Registered Feb. 17, 1950

AFFIDAVIT SEC. 8  
ACCEPTED

PRINCIPAL REGISTER  
Trademark

AFFIDAVIT SEC. 15  
RECEIVED 6-10-67

Int. No. 23,428, filed June 12, 1908

DATEJUST

Messrs. Rolex S. A. (Rolex Uhren Ag.) (Rolex Watch  
Co. Ltd.), (Swiss corporation)  
rue du Marche  
Geneve 18, Switzerland

For TIME-PIECES AND PARTS THEREOF, in  
CLASS 37  
First use in 1905, in commerce in 1911

1300101

# THE UNITED STATES OF AMERICA

~~TO ALL TO WHOM THESE PRESENTS SHALL COME:~~

UNITED STATES DEPARTMENT OF COMMERCE

United States Patent and Trademark Office

March 25, 2005

THE ATTACHED U.S. TRADEMARK REGISTRATION 683,249 IS  
CERTIFIED TO BE A TRUE COPY WHICH IS IN FULL FORCE AND  
EFFECT WITH NOTATIONS OF ALL STATUTORY ACTIONS TAKEN  
THEREON AS DISCLOSED BY THE RECORDS OF THE UNITED STATES  
PATENT AND TRADEMARK OFFICE.

REGISTERED FOR A TERM OF 20 YEARS FROM *August 11, 1959*  
2nd RENEWAL FOR A TERM OF 10 YEARS FROM *August 11, 1999*  
SECTION 8 & 15

SAID RECORDS SHOW TITLE TO BE IN:

*ROLEX WATCH, U. S. A., INC.*



By Authority of the  
COMMISSIONER OF PATENTS AND TRADEMARKS

*N. Woodson*  
N. WOODSON  
Certifying Officer

# United States Patent Office

683,249

Registered Aug. 11, 1959

## PRINCIPAL REGISTER Trademark

Ser. No. 63,731, filed Dec. 5, 1955

### GMT-MASTER

Montres Rolex S.A. (Swiss corporation)  
18, Rue du Marche  
Geneva, Switzerland

For: WATCHES, in CLASS 27.  
First use on or about Apr. 21, 1955; in commerce on  
or about Sept. 19, 1956.

1300101

# THE UNITED STATES OF AMERICA

**TO ALL TO WHOM THESE PRESENTS SHALL COME:**

UNITED STATES DEPARTMENT OF COMMERCE

United States Patent and Trademark Office

March 25, 2005

THE ATTACHED U.S. TRADEMARK REGISTRATION 860,527 IS  
CERTIFIED TO BE A TRUE COPY WHICH IS IN FULL FORCE AND  
EFFECT WITH NOTATIONS OF ALL STATUTORY ACTIONS TAKEN  
THEREON AS DISCLOSED BY THE RECORDS OF THE UNITED STATES  
PATENT AND TRADEMARK OFFICE.

REGISTERED FOR A TERM OF 20 YEARS FROM *November 19, 1968*  
1st RENEWAL FOR A TERM OF 20 YEARS FROM *November 19, 1988*  
SECTION 8 & 15

SAID RECORDS SHOW TITLE TO BE IN:

*ROLEX WATCH, U.S.A., INC.*

By Authority of the  
COMMISSIONER OF PATENTS AND TRADEMARKS



P. SWAIN

Certifying Officer

Int. Cl.: 14

Prior U.S. Cl.: 27

United States Patent and Trademark Office  
Renewal

Reg. No. 860,527  
Registered Nov. 19, 1968  
OG Date Apr. 18, 1989

**TRADEMARK  
PRINCIPAL REGISTER**

**SEA-DWELLER**

ROLEX WATCH U.S.A., INC. (NEW  
YORK CORPORATION)  
665 FIFTH AVENUE  
NEW YORK, NY 10022, ASSIGNEE OF  
MONTRES ROLEX S.A. (SWITZER-  
LAND CORPORATION) 1211 GENEVA  
24, SWITZERLAND

OWNER OF SWITZERLAND REG.  
NO. 215610, DATED 1-31-1966.

FOR: WATCHES AND CLOCKS, AND  
PARTS THEREOF, IN CLASS 27 (INT.  
CL. 14).

FIRST USE 6-9-1967; IN COMMERCE  
6-9-1967.

SER. NO. 289,907, FILED 1-30-1968.

*In testimony whereof I have hereunto set my hand  
and caused the seal of The Patent and Trademark  
Office to be affixed on Apr. 18, 1989.*

COMMISSIONER OF PATENTS AND TRADEMARKS

# United States Patent Office

860,527

Registered Nov. 19, 1968

## PRINCIPAL REGISTER Trademark

Ser. No. 289,907, filed Jan. 30, 1968

### SEA-DWELLER

Montres Rolex S.A. (Swiss corporation)  
3, rue Francois Dussaud  
1211 Geneva 24, Switzerland

For: WATCHES AND CLOCKS, AND PARTS  
THEREOF, in CLASS 27 (INT. CL. 14).  
First use June 9, 1967; in commerce June 9, 1967.  
Owner of Swiss Reg. No. 215,610, dated Jan. 31, 1966.

1300098

# THE UNITED STATES OF AMERICA

**TO ALL TO WHOM THESE PRESENTS SHALL COME:**

UNITED STATES DEPARTMENT OF COMMERCE  
United States Patent and Trademark Office

March 25, 2005

THE ATTACHED U.S. TRADEMARK REGISTRATION 239,383 IS  
CERTIFIED TO BE A TRUE COPY WHICH IS IN FULL FORCE AND  
EFFECT WITH NOTATIONS OF ALL STATUTORY ACTIONS TAKEN  
THEREON AS DISCLOSED BY THE RECORDS OF THE UNITED STATES  
PATENT AND TRADEMARK OFFICE.

REGISTERED FOR A TERM OF 20 YEARS FROM *March 06, 1928*  
3rd RENEWAL FOR A TERM OF 20 YEARS FROM *March 06, 1988*  
SECTION 8 & 15

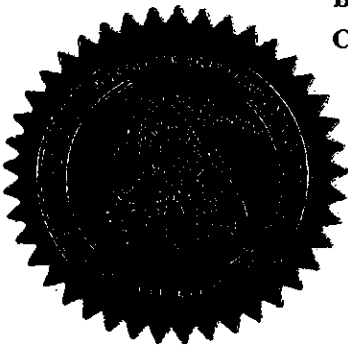
REPUBLISHED SECTION 12C

LESS GOODS

SAID RECORDS SHOW TITLE TO BE IN:

*ROLEX WATCH, U.S.A., INC.*

By Authority of the  
COMMISSIONER OF PATENTS AND TRADEMARKS



*L. Edelen*

L. EDELEN  
Certifying Officer



Int. Cl. 14

Prior U.S. Cl. 27

United States Patent and Trademark Office  
Renewal

Reg. No. 239,383  
Registered Mar. 6, 1928  
OG Date Oct. 4, 1988

**TRADEMARK  
PRINCIPAL REGISTER**

**OYSTER**

ROLEX WATCH U.S.A., INC. (NEW  
YORK CORPORATION)  
665 FIFTH AVENUE  
NEW YORK, NY 10022, ASSIGNEE BY  
MESNE ASSIGNMENT WILSDORF,  
HANS (GREAT BRITAIN CITIZEN)  
BIENNE, SWITZERLAND

OWNER OF SWITZERLAND REG.  
NO. 61367, DATED 7-29-1926

FOR: WATCHES, (MOVEMENTS;  
CASES) DIALS [-AND-OTHER-PARTS  
OF-WATCHES], IN CLASS 27 (INT. CL.  
14).

FIRST USE 7-0-1926; IN COMMERCE  
7-0-1926.

SER. NO. 233,783, FILED 10-7-1927.

*In testimony whereof I have hereunto set my hand  
and caused the seal of The Patent and Trademark  
Office to be affixed on Oct. 4, 1988.*

COMMISSIONER OF PATENTS AND TRADEMARKS

Registered Mar. 6, 1928.

Trade-Mark 239,383

Renewed, March 6, 1948, to Montres Rolex S. A., of Geneva, Switzerland.

## UNITED STATES PATENT OFFICE.

HANS WILSDORF, OF BIENNE, SWITZERLAND.

ACT OF FEBRUARY 20, 1905.

Application filed October 7, 1927. Serial No. 255,783.

# OYSTER

### STATEMENT.

*To the Commissioner of Patents:*

Hans Wilsdorf, a subject of the King of Great Britain, residing at 82 Chemin du Haut, Bienne, Switzerland, and doing business at 82 Chemin du Haut, Bienne, Switzerland, has adopted and used the trade-mark shown in the accompanying drawing, for ~~WATCHES, MOVEMENTS, CASES, DIALS, AND OTHER PARTS OF~~ ~~WATCHES~~, in Class 27, Horological instruments, and presents herewith five specimens showing the trade-mark as actually used by applicant upon the goods, and requests that the same be registered in the United States Patent Office in accordance with the act of February 20, 1905, as amended. The trade-mark has been continuously used and applied to said goods in applicant's business since July, 1926.

The trade-mark is usually applied or affixed to the goods, or to the packages containing the same, by means of labels having the mark printed thereon, or by impressing the mark directly upon the goods.

Said trade-mark has been registered in Switzerland, No. 62,867, dated 29th July 1926, on an application filed July 29, 1926.

Messrs. Ruege, Boyce & Bakelar, whose postal address is 261 Broadway, New York, N. Y., are designated, on whom process or notice of proceedings affecting the right to ownership of said trade-mark brought under the laws of the United States may be served.

The undersigned hereby appoints Messrs. Ruege, Boyce & Bakelar, (a firm composed of John H. Ruege, Francis E. Boyce and Walter L. Bakelar) 261 Broadway, New York, N. Y., its attorneys, with full powers of substitution and revocation, to prosecute this application for registration, to make alterations and amendments therein, to receive the certificate, and to transact all business in the Patent Office connected therewith.

HANS WILSDORF.

13002101

# THE UNITED STATES OF AMERICA

**TO ALL TO WHOM THESE PRESENTS SHALL COME:**

UNITED STATES DEPARTMENT OF COMMERCE

United States Patent and Trademark Office

March 29, 2005

THE ATTACHED U.S. TRADEMARK REGISTRATION 1,105,602 IS  
CERTIFIED TO BE A TRUE COPY WHICH IS IN FULL FORCE AND  
EFFECT WITH NOTATIONS OF ALL STATUTORY ACTIONS TAKEN  
THEREON AS DISCLOSED BY THE RECORDS OF THE UNITED STATES  
PATENT AND TRADEMARK OFFICE.

REGISTERED FOR A TERM OF 20 YEARS FROM *November 07, 1978*  
*1st* RENEWAL FOR A TERM OF 10 YEARS FROM *November 07, 1998*  
SECTION 8 & 15

SAID RECORDS SHOW TITLE TO BE IN:

*ROLEX WATCH U.S.A., INC.*

*A NEW YORK CORPORATION*

By Authority of the  
COMMISSIONER OF PATENTS AND TRADEMARKS



P. SWAIN  
Certifying Officer

Int. Cl. 14

Prior U.S. Cl. 27

United States Patent and Trademark Office

10 Year Renewal

Renewal Term Expires 10/13/2008

**TRADEMARK  
PRINCIPAL REGISTER**

**OYSTER PERPETUAL**

ROLEX WATCH U.S.A., INC. (NEW  
YORK CORPORATION)  
665 FIFTH AVENUE  
NEW YORK, NY 10022, ASSIGNEE OF  
MONTRES ROLEX S.A. (SWITZER-  
LAND CORPORATION) GENEVA,  
SWITZERLAND

OWNER OF U.S. REG. NO. 394,881.  
FOR: WATCHES AND PARTS THERE-  
OF, IN CLASS 14 (U.S. CL. 17).  
FIRST USE 2-25-1938; IN COMMERCE  
2-25-1938.

SER. NO. 73-165,727, FILED 4-10-1971.

*In testimony whereof I have hereunto set my hand  
and caused the seal of The Patent and Trademark  
Office to be affixed on Oct. 13, 1998.*

COMMISSIONER OF PATENTS AND TRADEMARKS

Int. Cl.: 14

Prior U.S. Cl.: 27

United States Patent and Trademark Office

Reg. No. 1,105,602  
Registered Nov. 7, 1978

**TRADEMARK**

Principal Register

**OYSTER PERPETUAL**

Montres Rotex S.A. (Swiss corporation)  
3, Rue Francois Dussand  
Geneva, Switzerland

For: WATCHES AND PARTS THEREOF, in CLASS  
14 (U.S. CL. 27).

First use at least as early as Feb. 25, 1938; in com-  
merce at least as early as Feb. 25, 1938.

Owner of Reg. No. 394,881.

Ser. No. 165,727, filed Apr. 10, 1978.

R. PEVERADA, Examiner

1300101

# THE UNITED STATES OF AMERICA

TO ALL TO WHOM THESE PRESENTS SHALL COME:

UNITED STATES DEPARTMENT OF COMMERCE

United States Patent and Trademark Office

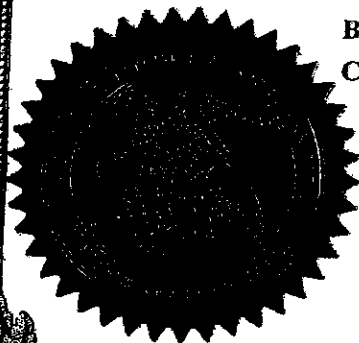
March 25, 2005

THE ATTACHED U.S. TRADEMARK REGISTRATION 1,749,374 IS  
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REGISTERED FOR A TERM OF 10 YEARS FROM *January 26, 1993*  
SECTION 8 & 15

SAID RECORDS SHOW TITLE TO BE IN:  
*REGISTRANT*

By Authority of the  
COMMISSIONER OF PATENTS AND TRADEMARKS



*N. Woodson*  
N. WOODSON  
Certifying Officer

Int. Cl.: 14

Prior U.S. Cl.: 27

**United States Patent and Trademark Office**

**TRADEMARK  
PRINCIPAL REGISTER**

**YACHT-MASTER**

ROLEX WATCH U.S.A., INC. (NEW YORK  
CORPORATION)  
665 FIFTH AVENUE  
NEW YORK, NY 100225305

FIRST USE 10-8-1992; IN COMMERCE  
10-8-1992.

SN 74-219,826, FILED 11-7-1991.

FOR: WATCHES, IN CLASS 14 (U.S. CL. 27).

JILL C. ALT, EXAMINING ATTORNEY



1300096

# THE UNITED STATES OF AMERICA

~~TO ALL TO WHOM THESE PRESENTS SHALL COME;~~

UNITED STATES DEPARTMENT OF COMMERCE

United States Patent and Trademark Office

March 28, 2005

THE ATTACHED U.S. TRADEMARK REGISTRATION 1,782,604 IS  
CERTIFIED TO BE A TRUE COPY WHICH IS IN FULL FORCE AND  
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THEREON AS DISCLOSED BY THE RECORDS OF THE UNITED STATES  
PATENT AND TRADEMARK OFFICE.

REGISTERED FOR A TERM OF 10 YEARS FROM *July 20, 1993*

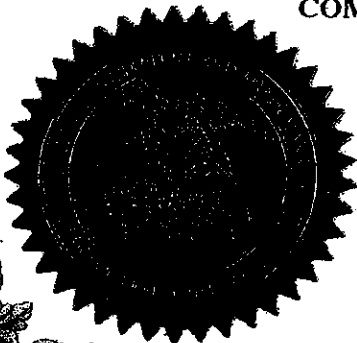
*1st* RENEWAL FOR A TERM OF 10 YEARS FROM *July 20, 2003*

SECTION 8 & 15

SAID RECORDS SHOW TITLE TO BE IN:

*REGISTRANT*

By Authority of the  
COMMISSIONER OF PATENTS AND TRADEMARKS



T. LAWRENCE  
Certifying Officer



Int. Cl.: 14

Prior U.S. Cl.: 27

**United States Patent and Trademark Office** Reg. No. 1,782,604  
Registered July 20, 1993

**TRADEMARK  
PRINCIPAL REGISTER**

**SUBMARINER**

ROLEX WATCH U.S.A., INC. (NEW YORK  
CORPORATION)  
665 FIFTH AVENUE  
NEW YORK, NY 10022

FIRST USE 0-0-1954; IN COMMERCE  
0-0-1954.

SER. NO. 74-336,069, FILED 12-2-1992.

FOR: WATCHES, IN CLASS 14 (U.S. CL. 27).

SUSAN LESLIE, EXAMINING ATTORNEY

1300096

# THE UNITED STATES OF AMERICA

TO ALL TO WHOM THESE PRESENTS SHALL COME:

UNITED STATES DEPARTMENT OF COMMERCE

United States Patent and Trademark Office

March 25, 2005

THE ATTACHED U.S. TRADEMARK REGISTRATION 1,960,768 IS CERTIFIED TO BE A TRUE COPY WHICH IS IN FULL FORCE AND EFFECT WITH NOTATIONS OF ALL STATUTORY ACTIONS TAKEN THEREON AS DISCLOSED BY THE RECORDS OF THE UNITED STATES PATENT AND TRADEMARK OFFICE.

REGISTERED FOR A TERM OF 10 YEARS FROM *March 05, 1996*  
SECTION 8 & 15

SAID RECORDS SHOW TITLE TO BE IN:  
*REGISTRANT*



By Authority of the  
COMMISSIONER OF PATENTS AND TRADEMARKS

*N. Woodson*  
N. WOODSON  
Certifying Officer

Int. Cl.: 14

Prior U.S. Cls.: 2, 27, 28, and 50

**United States Patent and Trademark Office** Reg. No. 1,960,768  
Registered Mar. 5, 1996

**TRADEMARK  
PRINCIPAL REGISTER**

**ROLEX DAYTONA**

ROLEX WATCH U.S.A., INC. (NEW YORK  
CORPORATION)  
665 FIFTH AVENUE  
NEW YORK, NY 10022

FIRST USE 0-0-1994; IN COMMERCE  
0-0-1994.

OWNER OF U.S. REG. NO. 101,819.

SN 74-453,503, FILED 10-27-1993.

FOR: WATCHES, IN CLASS 14 (U.S. CLS. 2,  
27, 28 AND 50).

ANGELA M. MICHELI, EXAMINING ATTOR-  
NEY

1300096

# THE UNITED STATES OF AMERICA

**TO ALL TO WHOM THESE PRESENTS SHALL COME:**

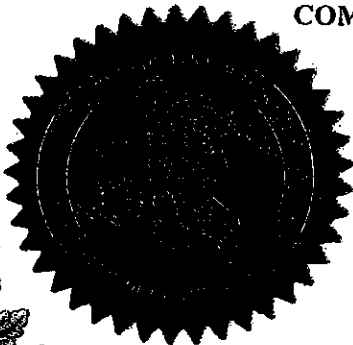
UNITED STATES DEPARTMENT OF COMMERCE  
United States Patent and Trademark Office

March 28, 2005

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REGISTRATION IS IN FULL FORCE AND EFFECT.

REGISTERED FOR A TERM OF 10 YEARS FROM *March 21, 2000*  
SAID RECORDS SHOW TITLE TO BE IN: *Registrant*

By Authority of the  
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T. LAWRENCE  
Certifying Officer

**Int. Cl.: 14**

**Prior U.S. Cls.: 2, 27, 28 and 50**

**United States Patent and Trademark Office**

**Reg. No. 2,331,145**

**Registered Mar. 21, 2000**

**TRADEMARK  
PRINCIPAL REGISTER**

**DAYTONA**

**ROLEX WATCH U.S.A., INC. (NEW YORK  
CORPORATION)  
665 FIFTH AVENUE  
NEW YORK, NY 10022**

**FIRST USE 0-0-1966; IN COMMERCE  
0-0-1966.**

**OWNER OF U.S. REG. NO. 1,960,768.**

**SER. NO. 75-518,406, FILED 7-13-1998.**

**FOR: WATCHES, IN CLASS 14 (U.S. CLS. 2,  
27, 28 AND 50).**

**BARBARA A. GOLD, EXAMINING ATTORNEY**

1300096

# THE UNITED STATES OF AMERICA

TO ALL TO WHOM THESE PRESENTS SHALL COME:

UNITED STATES DEPARTMENT OF COMMERCE  
United States Patent and Trademark Office

March 28, 2005

THE ATTACHED U.S. TRADEMARK REGISTRATION 2,445,357 IS  
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THE UNITED STATES PATENT AND TRADEMARK OFFICE WHICH  
REGISTRATION IS IN FULL FORCE AND EFFECT.

REGISTERED FOR A TERM OF 10 YEARS FROM *April 24, 2001*  
SAID RECORDS SHOW TITLE TO BE IN: *Registrant*

By Authority of the  
COMMISSIONER OF PATENTS AND TRADEMARKS



A handwritten signature in cursive script, reading "T. Lawrence", is positioned above the printed name of the certifying officer.

T. LAWRENCE  
Certifying Officer

**Int. Cl.: 14**

**Prior U.S. Cl.: 27**

**United States Patent and Trademark Office**

**Reg. No. 2,445,357**

**Registered Apr. 24, 2001**

**TRADEMARK  
PRINCIPAL REGISTER**

**EXPLORER II**

**ROLEX WATCH U.S.A., INC. (NEW YORK COR-  
PORATION)  
665 FIFTH AVENUE  
NEW YORK, NY 10022**

**FIRST USE 0-0-1972; IN COMMERCE 0-0-1972.**

**SER. NO. 74-506,238, FILED 3-22-1994.**

**FOR: WATCHES, IN CLASS 14 (U.S. CL. 27).**

**DAVID H. STINE, EXAMINING ATTORNEY**

**Int. Cl.: 14**

**Prior U.S. Cls.: 2, 27, 28, and 50**

**United States Patent and Trademark Office**

**Reg. No. 2,950,028**

**Registered May 10, 2005**

**TRADEMARK  
PRINCIPAL REGISTER**

**TURN-O-GRAPH**

ROLEX WATCH U.S.A., INC. (DELAWARE COR-  
PORATION)  
665 FIFTH AVENUE  
NEW YORK, NY 10022

FIRST USE 9-15-2004; IN COMMERCE 9-15-2004.

SN 78-252,196, FILED 5-20-2003.

FOR: WATCHES AND PARTS THEREOF, IN  
CLASS 14 (U.S. CLS. 2, 27, 28 AND 50).

DEZMONA MIZELLE, EXAMINING ATTORNEY



**Int. Cl.: 14**

**Prior U.S. Cls.: 2, 27, 28 and 50**

**United States Patent and Trademark Office**

**Reg. No. 2,985,308**

**Registered Aug. 16, 2005**

**TRADEMARK  
PRINCIPAL REGISTER**

**GMT-MASTER II**

ROLEX WATCH U.S.A., INC. (NEW YORK CORPORATION)  
665 FIFTH AVENUE  
NEW YORK, NY 100225305

OWNER OF U.S. REG. NO. 683,249.

FOR: WATCHES AND PARTS THEREOF, IN CLASS 14 (U.S. CLS. 2, 27, 28 AND 50).

NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE "II", APART FROM THE MARK AS SHOWN.

FIRST USE 12-31-1984; IN COMMERCE 12-31-1984.

SER. NO. 78-422,009, FILED 5-20-2004.

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT, STYLE, SIZE, OR COLOR.

DOMINIC J. FERRAIUOLO, EXAMINING ATTORNEY



rolex

Page 1 of 2

SEARCH  Go

ROLEX

PANERAI

MOVADO

BREITLING

PATEK PHILIPPE

CARTIER

BVLGARI

NEW ARRIVED

IWC

Yahoo!

**Featured Products****Rolex submariner(green)**

Regular price: \$500.00  
Sale price: \$225.00

**Patek Philippe lady's watch  
(pearl with diamond)**

\$80.00

**Rolex daytona (Paul Newman)**

Regular price: \$600.00  
Sale price: \$299.00

**Panerai Pam 249 Vintage  
47mm Radiomir California Dial**

Regular price: \$699.00  
Sale price: \$399.00

**Panerai luminor marina 45mm  
titanium**

Regular price: \$500.00  
Sale price: \$250.00

**IWC swiss ETA 2824 watch  
(#151)**

\$250.00

**SWISS ETA movement**

High quality SWISS ETA automatic movement.

\* Stop second hand \*

\* 25 jewelries \*

\* Power reserved 38 hours \*

\* Frequency 28800 A/H \*

**\* Smooth sweeping second hand \***

**\* Momentary Date change\***

SEARCH  Go

ROLEX [Home](#) > [ROLEX](#) > [Submariner](#) > [Rolex submariner \(black\)](#)

**PANERAI**

**Rolex submariner (black)**

**MOVADO**

**BREITLING**

**PATEK PHILIPPE**

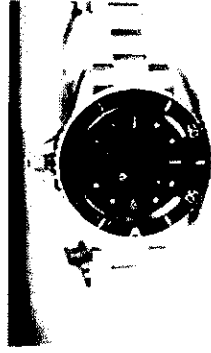
**CARTIER**

**BVLGARI**

**NEW ARRIVED**

**IWC**

**YAHOO!**



Item# rolex-submariner-black

Regular price: \$500.00

Sale price: \$225.00



**Product Description**



New Men's 40mm stainless steel, Swiss made 25 Jewels reliable automatic self-winding ETA 2836 movement, Chronograph, Sapphire crystal face, water resistant, Laser etched crown on 6 o'clock, sweep second hand.

High quality SWISS ETA automatic movement.

\* Stop second hand \*

\* 25 jewelries \*

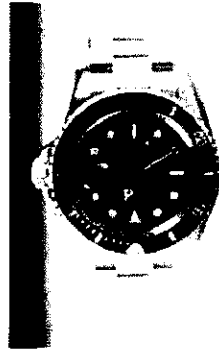
\* Power reserved 38 hours \*

\* Frequency 28800 A/H \*

\* Smooth sweeping second hand \*

\* Momentary Date change\*



SEARCH  Go[Home](#) > [ROLEX](#) > [Submariner](#) > Rolex submariner (black-2tone)**Rolex submariner (black-2tone)**

Item# rolex-submariner-black2ton2

Regular price: \$500.00

**Sale price: \$225.00**

MOVADO

BREITLING

PATEK PHILIPPE

CARTIER

BVLGARI

NEW ARRIVED

IWC

**Product Description**

New Men's 39's 40mm stainless steel & 18K plated gold, Swiss made 25 Jewels reliable automatic self-winding ETA 2836 movement, Chronograph, Sapphire crystal face, water resistant, Laser etched crown on 6 o'clock, sweep second hand.

High quality SWISS ETA automatic movement.

\* Stop second hand \*

\* 25 jewelries \*

\* Power reserved 38 hours \*

\* Frequency 28800 A/H \*

\* Smooth sweeping second hand \*

\* Momentary Date change\*

**YAHOO!**

Rolex submariner (black-2tone)

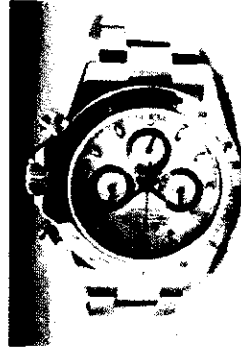
Page 2 of 2

http://www.pilotwatch.com/rolex-submariner-black-2ton2.html

http://www.pilotwatch.com/rolex-submariner-black-2ton2.html

3/10/2009



SEARCH  Go[Home](#) > [ROLEX](#) > [Daytona](#) > [Rolex daytona \(white\)](#)**Rolex daytona (white)**

Item # rolex-daytona-white

Regular price: \$600.00

Sale price: \$275.00

**Product Description**

New Men's 40mm stainless steel, Swiss made 27 Jewels reliable automatic self-winding Valjoux ETA 7750 movement, Chronograph, Sapphire crystal face , water resistant, Laser etched crown on 6 o'clock, sweep second hand.

High quality SWISS Valjoux ETA 7750 automatic movement.

\* fully chronometer \*

\* 27 jewelries \*

\* Power reserved 38 hours \*

\* Frequency 28800 A/H \*

\* Smooth sweeping second hand \*

**YAHOO!**

Rolex daytona (white)

Page 2 of 2

<http://www.pilotwatch.com/rolex-daytona-white.html>

3/10/2009

SEARCH  Go[Home](#) > [ROLEX](#) > [Daytona](#) > [Rolex daytona \(Paul Newman\)](#)**Rolex daytona (Paul Newman)**

Item# rolex-daytona-paul-newman

Regular price: \$600.00

**Sale price: \$299.00**

PATEK PHILIPPE

CARTIER

BVLGARI

NEW ARRIVED

IWC

**Product Description**

New Men's 40mm stainless steel, Swiss made 27 Jewels reliable automatic self-winding Valjoux ETA 7750 movement, Chronograph, Sapphire crystal face, water resistant, Laser etched crown on 6 o'clock, sweep second hand.

High quality SWISS Valjoux ETA 7750 automatic movement.

\* fully chronometer \*

\* 27 jewelries \*

\* Power reserved 38 hours \*

\* Frequency 28800 A/H \*

\* Smooth sweeping second hand \*

**YAHOO!**

Rolex daytona (Paul Newman)

Page 2 of 2

<http://www.pilottwatch.com/rolex-daytona-paul-newman.html>

3/10/2009

SEARCH  Go[Home](#) > [ROLEX](#) > [GMT-Master II](#) > [Rolex GMT-Master II \(blue/red\)](#)**Rolex GMT-Master II (blue/red)**

MOVADO

BREITLING

PATEK PHILIPPE

CARTIER

BVLGARI

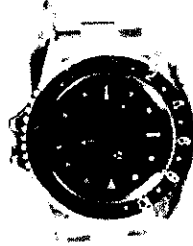
NEW ARRIVED

IWC

**YAHOO!**

Item# rolex-gmtmaster-ii-bluered

Regular price: \$500.00

**Sale price: \$225.00****Product Description**

New Men's 40mm stainless steel, Swiss made 25 Jewels reliable automatic self-winding ETA 2836 movement, Chronograph, Sapphire crystal face, water resistant, Laser etched crown on 6 o'clock, sweep second hand.

High quality SWISS ETA automatic movement.

\* Stop second hand \*

\* 25 jewelries \*

\* Power reserved 38 hours \*

\* Frequency 28800 A/H \*

\* Smooth sweeping second hand \*

Rolex GMT-Master II (blue/red)

Page 2 of 2

<http://www.pilotwatch.com/rolex-gmtmaster-ii-bluered.html>

3/10/2009

SEARCH  Go

ROLEX

[Home](#) > [ROLEX](#) > [Explorer](#) > [Rolex Explorer II \(black\)](#)

PANERAI

**Rolex Explorer II (black)**

MOVADO

BREITLING

PATEK PHILIPPE

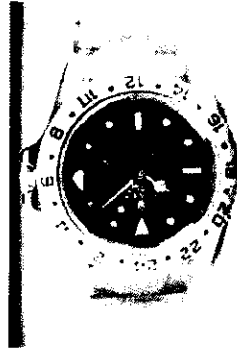
CARTIER

BVLGARI

NEW ARRIVED

IWC

YAHOO!



Item# rolex-explorer-ii-black

Regular price: \$500.00

**Sale price: \$225.00****Product Description**

New Men's 40mm stainless steel, Swiss made 25 Jewels reliable automatic self-winding ETA 2836 movement, Chronograph, Sapphire crystal face, water resistant, Laser etched crown on 6 o'clock, sweep second hand.

High quality SWISS ETA automatic movement.

\* Stop second hand \*

\* 25 jewelries \*

\* Power reserved 38 hours \*

\* Frequency 28800 A/H \*

\* Smooth sweeping second hand \*

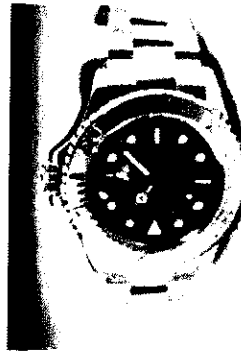
Rolex Explorer II (black)

Page 2 of 2

<http://www.pilottwatch.com/rolex-explorer-ii-black.html>

3/10/2009



SEARCH  Go[Home](#) > [ROLEX](#) > [Yacht-Master](#) > [Rolex Yacht-Master \(blue-2tone\)](#)**Rolex Yacht-Master (blue-2tone)**

Item # rolex-yachtmaster-blue2ton2

Regular price: \$500.00

**Sale price: \$225.00**

BREITLING

PATEK PHILIPPE

CARTIER

BVLGARI

NEW ARRIVED

IWC

**Product Description**

New Men's 40mm stainless steel & 18k plated gold, Swiss made 25 Jewels reliable automatic self-winding ETA 2836 movement, Chronograph, Sapphire crystal face, water resistant, Laser etched crown on 6 o'clock, sweep second hand.

High quality SWISS ETA automatic movement.

\* Stop second hand \*

\* 25 jewelries \*

\* Power reserved 38 hours \*

\* Frequency 28800 A/H \*

\* Smooth sweeping second hand \*

YAHOO!

Rolex Yacht-Master (blue-2tone)

Page 2 of 2

<http://www.pilottwatch.com/rolex-yachtmaster-blue2ton2.html>

3/10/2009

SEARCH  Go[Home](#) > [ROLEX](#) > [turn-o-graph](#) > [Rolex Turn-o-graph \(white\)](#)**Rolex Turn-o-graph (white)**

Item # rolex-turnograph-white

Regular price: \$500.00

Sale price: \$225.00



PATEK PHILIPPE

CARTIER

BVLGARI

NEW ARRIVED

IWC

**Product Description**

New unisex 36mm stainless steel, Swiss made 25 Jewels reliable automatic self-winding ETA 2836 movement, Chronograph, Sapphire crystal face, water resistant, Laser etched crown on 6 o&#39;clock, sweep second hand.

High quality SWISS ETA automatic movement.

- \* Stop second hand \*
- \* 25 jewelries \*
- \* Power reserved 38 hours \*
- \* Frequency 28800 A/H \*
- \* Smooth sweeping second hand \*

**YAHOO!**

Rolex Turn-o-graph (white)

Page 2 of 2

<http://www.pilotwatch.com/rolex-turnograph-white.html>

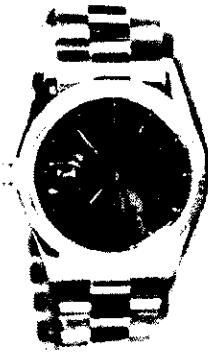
3/10/2009

SEARCH  Go

[Home](#) > [ROLEX](#) > [Datejust](#) > [Rolex Datejust \(blue\)](#)

**ROLEX**  
**PANERAI**  
**MOVADO**  
**BREITLING**  
**PATEK PHILIPPE**  
**CARTIER**  
**BVLGARI**  
**NEW ARRIVED**  
**IWC**

**Rolex Datejust (blue)**



Item # rolex-datejust-blue

Regular price: \$500.00

Sale price: \$225.00



**Product Description**



New Unisex 36mm stainless steel, Swiss made 25 Jewels reliable automatic self-winding ETA 2836 movement, Chronograph, Sapphire crystal face, water resistant, Laser etched crown on 6 o'clock, sweep second hand, screws on band not pins.

High quality SWISS ETA automatic movement.

\* Stop second hand \*

\* 25 jewelries \*

\* Power reserved 38 hours \*

\* Frequency 28800 A/H \*

\* Smooth sweeping second hand \*

\* Momentary Date change\*

**YAHOO!**

Rolex Datejust (blue)

Page 2 of 2

http://www.pilottwatch.com/rolex-datejust-blue.html

http://www.pilottwatch.com/rolex-datejust-blue.html

3/10/2009

SEARCH  Go

**ROLEX**

We have Swiss ETA Men's and Ladie's Replica Watches from Rolex to the Popular Panerai Watch pilottwatch.com is a new endeavor from a watchmaker team with years of experience with replica Rolex Swiss watches. You are come across something much more than just another Rolex replica site.

**PANERAI**

**MOVADO**

The newly burgeoning fake Swiss Rolex replica Internet business can be a difficult market for a customer to find a reliable and experienced merchant. We know -- we are been there. Due to the wide range of price and quality available from street merchandise to the elusive products of true craftsmanship, it can be complicated at first to decipher what's quality and what's not. For this reason, many online merchants fail to find the best manufacturers or materials, and cannot offer the fine products many of you are looking for.

**BREITLING**

**PATEK PHILIPPE**

Having been in this business from the beginning, we are developed an exceptional knowledge base of the market. By traveling to China, the epicenter of replica manufacturing, we are found out not only how to tell poor quality from good quality, but we are learned how to develop and manufacture the products ourselves. Without a middle man, we are able to offer low prices, and you can be certain of the craftsmanship that goes into every watch.

**CARTIER**

**BVLGARI**

We are experts in Swiss replica, and are confident you can see that for several reasons:

**NEW ARRIVED**

We provide seven clear and detailed pictures of every watch on our site. The photos you see are of the actual watch you will receive whether you are looking for a replica Panerai watch or a Rolex knock-off. We offer a professional replica guide on our site that educates customers on what we are learned about Swiss replica, so you can discern quality for yourself. Swiss Expert happily provides a 30% wholesale discount to our resellers. Swiss Expert has a broad inventory of brand names when it comes to gentlemanly or lady replica watches from Rolex to Audemars Piguet. Each is of guaranteed top quality replication. All of our watches come with a 6 month guarantee, and may be returned for full refund or replacement within 15 days of receipt with no questions asked. We will happily answer any questions before you purchase, and will follow up to ensure 100% satisfaction with your new watch.

**IWC**



garylok1025@yahoo.com

Shipping and handling is \$25 via USPS 2 days Priority Mail to the USA or Canada. International is \$45 for global express.

| | | | |

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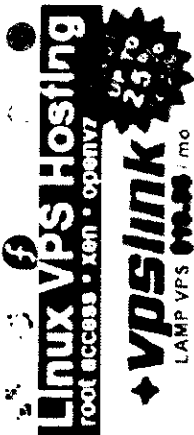




vendor by email sent to:  
Show Summary View Welcome **rusa**  My Account

Contact: garylok1025@yahoo.com

 [TrafficZ](#) [DomainTools](#) [LeaseThis.com](#)



Google  Search

Enter a Domain Name  Go

Whois Record for Pilottwatch.com ( Pilot Twitch )

Front Page Information

Website Title: [rolex](#)  
Title Relevancy 100%

AboutUs:  [Wiki article on Pilottwatch.com](#)  
SEO Score: 83%

Terms: 127 (Unique: 86, Linked 62)  
Images: 8 (Alt tags missing 1)  
Links: 33 (Internal: 30, Outbound: 3)

Indexed Data

Alexa Trend/Rank: #10,339,517 Up 9,196,653 ranks over the last three months.

Registry Data


ICANN Registrar: MELBOURNE IT, LTD. D/B/A INTERNET

PS

## NAMES WORLDWIDE

**Created:** 2008-12-16**Expires:** 2009-12-16**Updated:** 2008-12-16**Registrar Status:** [clientTransferProhibited](#)**Name Server:** YNS1.YAHOO.COM (has [2,444,407](#) domains)**Name Server:** YNS2.YAHOO.COM**Whois Server:** whois.melbourneit.com


## Server Data

**IP Address:** 216.252.126.190 [Whois](#) | [Reverse-IP](#) |[Ping](#) | [DNS Lookup](#) | [Traceroute](#)**IP Location:**  California Sunnyvale - Yahoo**Response Code:** 200**Domain Status:** Registered And Active Website

## DomainTools Exclusive

**Email Search:** [domain@ha.yahoo-inc.com](#) is associated

with about 2,403,204 domains

**Registrar:** [1 registrar](#)**History:****NS History:** [1 change](#) on 2 unique name servers over 1 year.**IP History:** [1 change](#) on 2 unique name servers over 1 years.**Whois History:** [3 records](#) have been archived since 2008-12-17.**Reverse IP:** [34,133 other sites](#) hosted on this server.**Monitor Domain:**  [Set Free Alerts on pilottwatch.com](#)**Free Tool:**  [Download DomainTools for Windows](#)

## SEO Text Browser

Loading.. SEO Text Browser  
false<http://www.pilottwatch.com>

Whois Record

Domain Name..... pilottwatch.com  
Creation Date..... 2008-12-17  
Registration Date.... 2008-12-17  
Expiry Date..... 2009-12-17  
Organisation Name.... Gary lok  
Organisation Address.. Private salon  
Organisation Address.  
Organisation Address. New York  
Organisation Address. 10013  
Organisation Address. NY  
Organisation Address. UNITED STATES  
  
Admin Name..... Gary lok  
Admin Address..... Private salon  
Admin Address.....  
Admin Address..... New York  
Admin Address. . . . 10013  
Admin Address..... NY  
Admin Address..... UNITED STATES  
Admin Email..... [garlokl@pilottwatch.com](mailto:garlokl@pilottwatch.com)  
  
Admin Phone..... +1.7189964638  
Admin Fax.....  
  
Tech Name..... YahooDomains TechContact  
Tech Address..... 701 First Ave.  
Tech Address.....  
Tech Address..... Sunnyvale  
Tech Address..... 94089  
Tech Address..... CA  
Tech Address..... UNITED STATES  
Tech Email..... [domains@pilottwatch.com](mailto:domains@pilottwatch.com)  
  
Tech Phone..... +1.6198813096  
Tech Fax.....  
Name Server..... yns1.yahoo.com  
Name Server..... yns2.yahoo.com

[Disable SEO Text Browser \(Beta\)](#)

Other TLDs


.com .net .org .biz .info .us

Symbol Key

[Hide Key](#)

Available  
Available (Previously registered)  
Registered (Active website)  
Registered (Parked or redirected)  
Registered (No website)  
On-Hold (Generic)  
On-Hold (Redemption Period)  
On-Hold (Pending Delete)  
Monitor  
Preview  
No preview  
Buy this (Available)  
Buy this (Bid at auction)

ieWatches



onsaler.com





luxury Watches On Sale

luxury Watches

\$189.99

luxury Watches, Free Shipping, Secure Card Checkout

1 of 6 items



ony.com

Domains for Sale

Domain	Price
<a href="#">MobilePilot.com</a>	\$200.00
<a href="#">CaliforniaPilot.com</a>	\$488.00
<a href="#">PerfectPilot.com</a>	\$180.00
<a href="#">PilotLake.com</a>	\$688.00
<a href="#">PilotCountry.com</a>	\$1,500.00
<a href="#">SnowPilot.com</a>	\$200.00
<a href="#">PilotProductions.com</a>	\$500.00
<a href="#">PilotWay.com</a>	\$788.00
<a href="#">PilotPerformance.com</a>	\$1,088.00
<a href="#">PrizePilot.com</a>	\$1,788.00
<a href="#">WeatherPilot.com</a>	\$1,288.00

Domains At Auction

Domain	Auction Date
<a href="#">PilotIdiGuy.com</a>	03-11-2009
<a href="#">SearchEnginePilot.com</a>	03-13-2009
<a href="#">MdWPilotBase.com</a>	03-13-2009

<a href="#">Pilot5.net</a>	03-23-2009
<a href="#">Hitch2Pilot.com</a>	03-26-2009
<a href="#">PilotChiX.com</a>	04-04-2009

Compare Similar Domains

Domain	Created
<a href="#">Pilo</a>	1998-11-04
<a href="#">Pilo - Productions</a>	2000-11-24
<a href="#">Pil Ny</a>	2002-04-04
<a href="#">Pilo - Watches</a>	2002-05-09
<a href="#">Pil Ny Pines</a>	2002-09-14
<a href="#">Pilo Hygiene</a>	2004-01-02
<a href="#">Pilo - Sex</a>	2004-12-18
<a href="#">Pi Loan</a>	2006-02-16
<a href="#">Pilo - Tee</a>	2006-05-31
<a href="#">Pill No</a>	2006-06-04
<a href="#">Pil Ns Ne Ru R Quel</a>	2006-07-27
<a href="#">Pi Ln School</a>	2006-08-17
<a href="#">Pi Ln Ser Urquell</a>	2006-09-03
<a href="#">Pi Ln K World</a>	2006-12-01
<a href="#">Pi Load</a>	2007-01-26

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- ☒ Indexed Data
- ☒ Server Data
- ☒ Registry Data
- ☒ Exclusive
- ☒ Whois Record
- Data



January 12, 2007

**BY EMAIL: iwatch20@yahoo.com**  
**AND FIRST CLASS MAIL**

Gary Lok  
1527 W. 11th Street  
Brooklyn, NY 11204

**Re: Rolex Watch U.S.A., Inc.**

Dear Mr. Lok:

This firm is general counsel to Rolex Watch U.S.A., Inc. ("Rolex"), the owners of the federally registered Rolex Trademarks: ROLEX, PRESIDENT, SUBMARINER, YACHT-MASTER, DAYTONA, GMT-MASTER, DATEJUST and Crown Device (among others).

It has recently come to our attention that you are offering for sale and selling merchandise bearing the Rolex Trademarks, or bearing marks substantially indistinguishable thereto, on iOffer.com, and that this merchandise is COUNTERFEIT.

Such use is likely to cause confusion and constitutes counterfeiting, trademark infringement and dilution of Rolex's intellectual property rights in violation of both federal and state laws. As a result of your conduct, you may be held liable for trademark counterfeiting and infringement. The penalties for such conduct are severe and may include injunctive relief, actual damages, statutory damages of up to \$1,000,000 for each trademark that has been counterfeited, costs and attorneys' fees.

On behalf of Rolex, we demand that you immediately cease and desist from any and all offering for sale, sale, distribution, importation, manufacture, advertisement, promotion and display of counterfeit Rolex merchandise. We also demand that you do the following:

1. Surrender all counterfeit Rolex goods in your possession, custody or control.
2. Provide the identity of the source of the counterfeit Rolex goods.
3. Make payment to "Rolex Watch U.S.A., Inc." by bank or certified check, or money order, for all damages and costs incurred by Rolex in connection with your illegal conduct, in the amount of **\$300USD**.



We strongly urge you not to contact the supplier of the counterfeit merchandise or to take any other action which would interfere with our client's ability to eliminate counterfeit merchandise from the marketplace and will hold you responsible for your complicity in any such actions to the maximum extent provided by law.

Please be advised that your failure to respond in writing or to comply with these demands before **January 19, 2007**, will result in Rolex taking legal action to enforce its rights. Please send all information, along with your payment, to the attention of the undersigned at the above referenced address. If you have any questions, please call (212) 705-9805.

This letter does not constitute an exhaustive list of Rolex claims or rights, all of which are hereby expressly reserved.

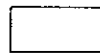
We await a response from you or your counsel.

Sincerely,

Gibney, Anthony & Flaherty, LLP

By: 

John Macaluso



February 8, 2007

**BY EMAIL: iwatch20@yahoo.com**  
**AND FIRST CLASS MAIL**

Gary Lok  
1527 W. 11th Street  
Brooklyn, NY 11204

**Re: Rolex Watch U.S.A., Inc.**

Dear Mr. Lok:

As you are aware, this firm is general counsel to Rolex Watch U.S.A., Inc. ("Rolex").

We repeat our notice of January 12, 2007 that you may be held liable for trademark counterfeiting and infringement in connection with your offer for sale or sale of counterfeit Rolex merchandise on iOffer.com.

As a result, we again demand that you:

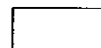
- (1) surrender all counterfeit Rolex goods in your possession, custody or control;
- (2) provide the identity of the source of the counterfeit Rolex goods; and
- (3) make payment to "Rolex Watch U.S.A., Inc." by bank or certified check, or money order, for all damages and costs incurred by Rolex in connection with your illegal conduct, in the amount of **\$300USD**.

You are on notice of Rolex's position and protest in this matter. We reserve the right to take any and all appropriate further action. We await an immediate response from you or your counsel.

Sincerely,

Gibney, Anthony & Flaherty, LLP

By: John MacLennan



John Macaluso





Attorneys at Law  
665 Fifth Avenue  
New York, NY 10022  
212.688.5151  
212.688.8315 Fax  
www.gibney.com

John Macaluso  
jmacaluso@gibney.com

April 3, 2009

**BY EMAIL:** garylok1025@yahoo.com

**RE: ROLEX WATCH U.S.A., INC.**  
**TRADEMARK INFRINGEMENT: PILOTTWATCH.COM**

To Whom It May Concern:

This firm is general counsel to Rolex Watch U.S.A. Inc. ("Rolex"), the owners of the federally registered Rolex Trademarks: ROLEX, PRESIDENT, SUBMARINER, YACHT-MASTER, DAYTONA, GMT-MASTER, DATEJUST and Crown Device (among others) (the "Rolex Trademarks").

**We are writing to demand that you immediately cease the sale of counterfeit Rolex watches in order to avoid legal action by Rolex.**

It has come to Rolex's attention that you are offering for sale and selling watches bearing one or more Rolex Trademarks (or bearing marks substantially indistinguishable thereto) through the website [pilotwatch.com](http://pilotwatch.com) and that this merchandise is COUNTERFEIT.

Such use is likely to cause confusion and constitutes counterfeiting, trademark infringement and dilution of Rolex's intellectual property rights in violation of both federal and state laws. As a result of your conduct, you may be held liable for trademark counterfeiting and infringement. The penalties for such conduct are severe and may include injunctive relief, actual damages, statutory damages of up to \$2,000,000 for each trademark that has been counterfeited, costs and attorneys' fees.

In order to avoid legal proceedings, we must receive your written assurances by **April 10, 2009**, that you have already removed all web page content relating to the unlawful use of the Rolex Trademarks from this website, including the corresponding metatags, HTML, etc. In addition, we ask that you provide us with the following:

San Francisco Office: Two Transamerica Center, 505 Sansome Street, Suite 1200, San Francisco, CA 94111 tel 415.901.2270

Associated Offices: Gros & Waltenspuhl, Rue Beauregard 9, CH-1204 Geneva, Switzerland tel +41 22.311.3833  
Magrath LLP, 66/67 Newman Street, London, W1T 3EQ, United Kingdom tel +44 207.495.3003



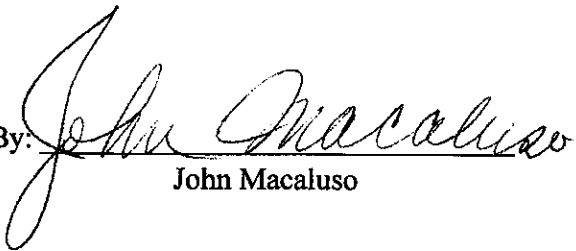
1. All counterfeit Rolex watches and any merchandise bearing any of the Rolex Trademarks presently in your possession or control.
2. A representation that any merchandise bearing marks substantially indistinguishable or identical to the Rolex Trademarks has been withdrawn from sale.
3. The identity of your supplier for the counterfeit Rolex watches.

Please be advised that your failure to respond or to comply with these demands will result in Rolex taking legal action to enforce its rights. You are also hereby advised that your Internet Service Provider has been notified of this serious matter.

We await a response from you or your counsel.

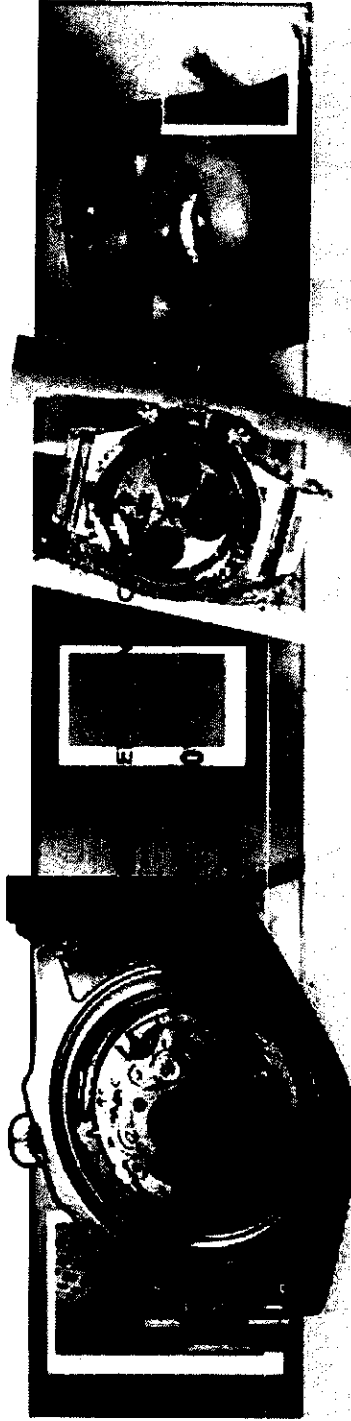
Sincerely,

Gibney, Anthony & Flaherty, LLP

By:   
John Macaluso



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**Chanel J12 ceramic 42mm-chronometer (black)-diamond**

(Availability: In Stock)



Japan made reliable Quartz Fully chronometer movement

| Add to Cart |

click to enlarge  
\$225.00

**Panerai 1950 8 days GMT**

(Availability: In Stock)



BRAND NEW LUMINOR PANERAI WATCH

| Add to Cart |

click to enlarge  
\$225.00

**Rolex daytona (paul-newman)**

(Availability: In Stock)



rolex vintage style

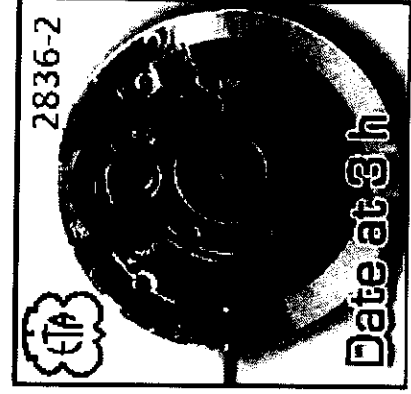
| Add to Cart |

click to enlarge  
\$299.00

swiss ETA movment

High quality SWISS ETA 2836 automatic movement.

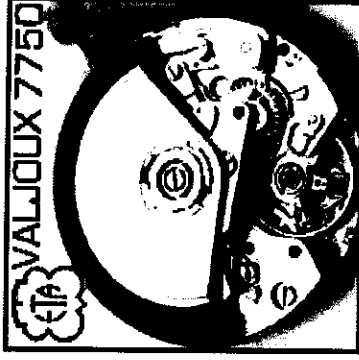
- \* Stop second hand \*
- \* 25 jewelries \*
- \* Power reserved 38 hours \*
- \* Frequency 28800 A/H \*
- \* Smooth sweeping second hand \*
- \* Momentary Date change\*





**High quality SWISS ETA Valjoux 7750 automatic movement.**

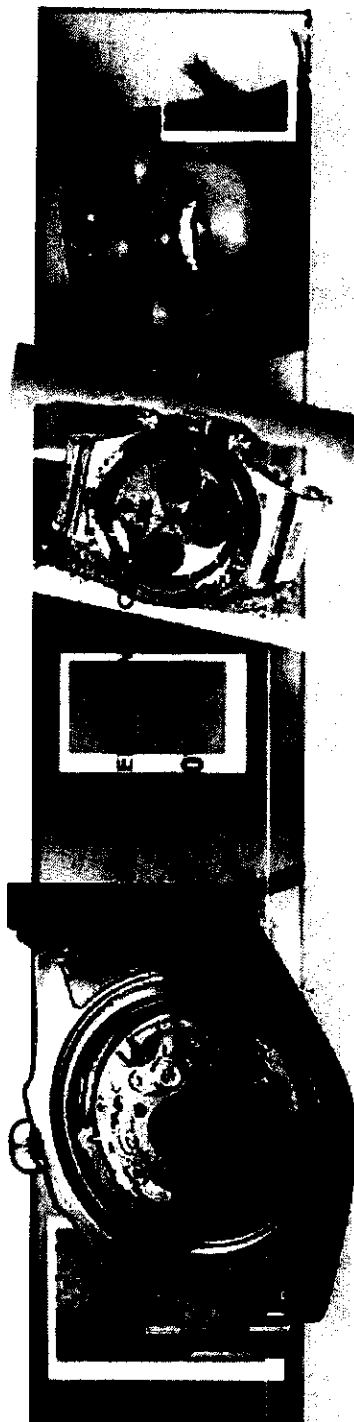
- \* Fully chronometer \***
- \* Stop second hand \***
- \* 27 jewelries \***
- \* Power reserved 38 hours \***
- \* Frequency 28800 A/H \***
- \* Smooth sweeping second hand \***



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[Chanel](#)

[Rolex](#)

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Rolex day-date(white) : \$225.00

New unisex 38mm stainless steel, Swiss made 25 Jewels reliable automatic self-winding ETA 2836 movement, Chronograph, Sapphire crystal face, water resistant, Laser etched crown on 6 o'clock, sweep second hand, screws on band not pins.

High quality SWISS ETA automatic movement.

\* Stop second hand \*

\* 25 Jewels \*

\* Power reserved 38 hours \*

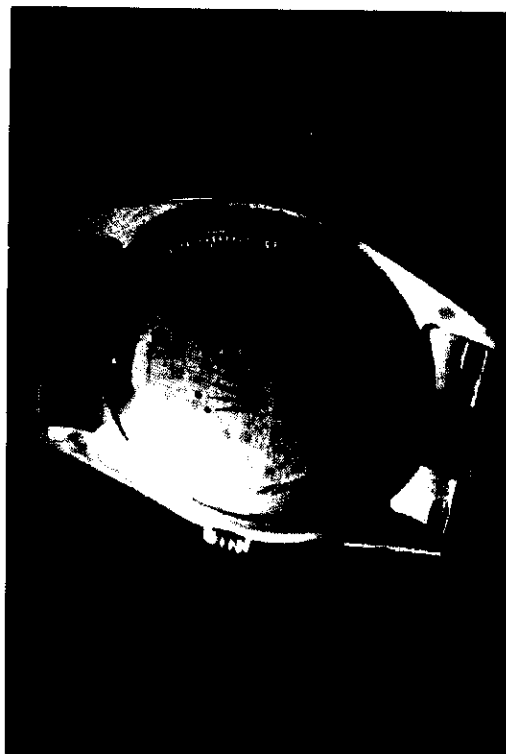
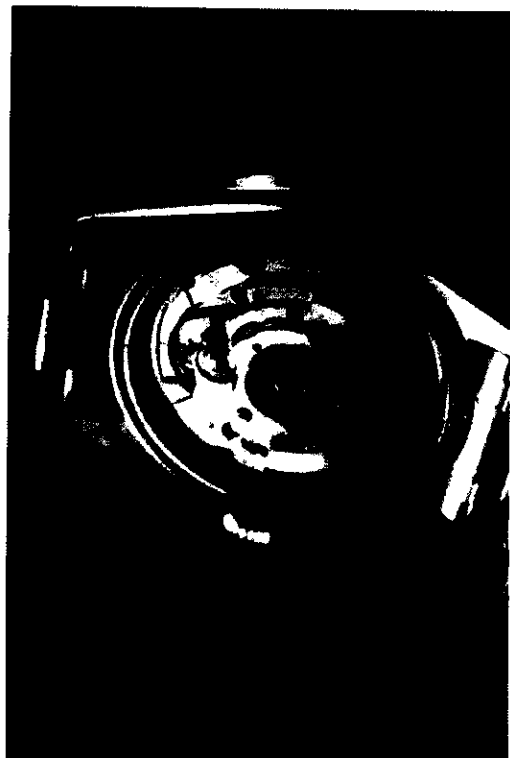
\* Frequency 28800 A/H \*

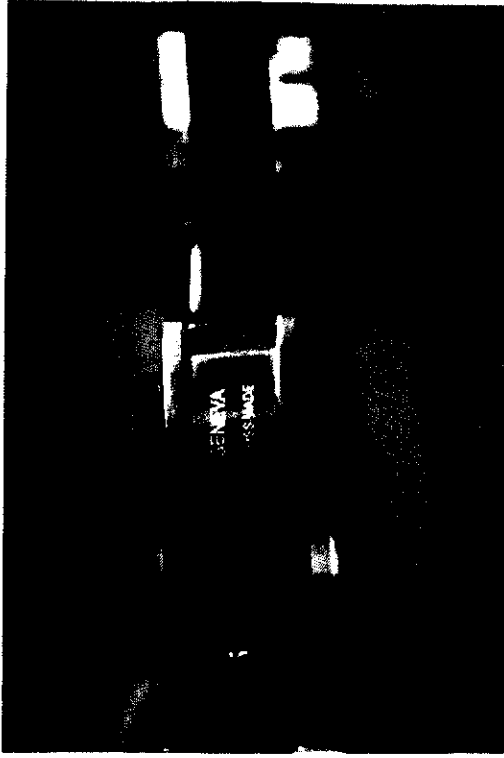
\* Smooth sweeping second hand \*

\* Momentary Date change\*



[click to enlarge](#)





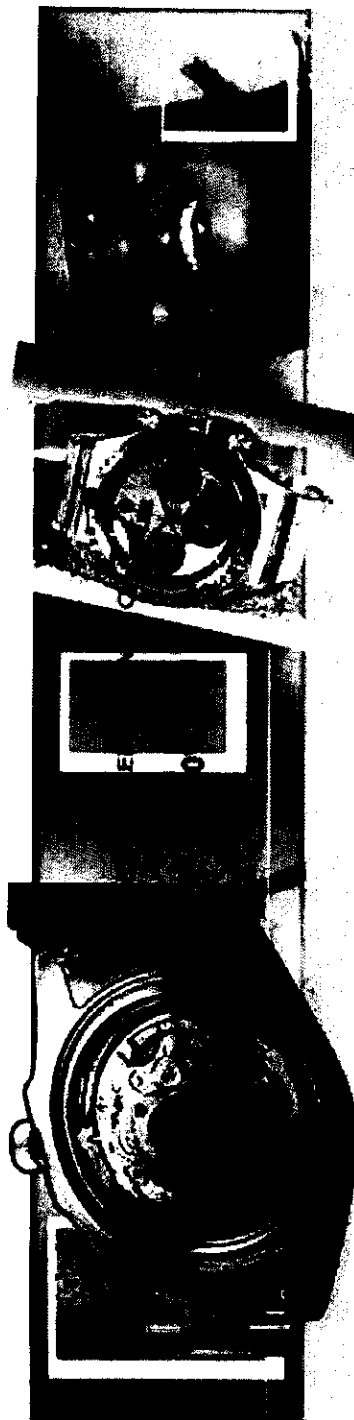
\$225.00  Add to Cart

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[Chanel](#)
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Rolex datejust(blue) : \$225.00

New unisex 38mm stainless steel, Swiss made 25 Jewels reliable automatic self-winding ETA 2836 movement, Chronograph, Sapphire crystal face, water resistant, Laser etched crown on 6 o'clock, sweep second hand, screws on band not pins.

High quality SWISS ETA automatic movement.

\* Stop second hand \*

\* 25 Jewels \*

\* Power reserved 38 hours \*

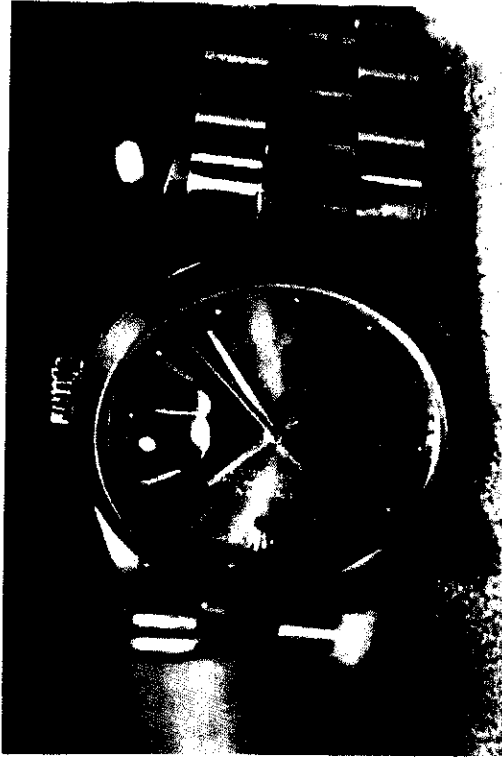
\* Frequency 28800 A/H \*

\* Smooth sweeping second hand \*

\* Momentary Date change\*



[click to enlarge](#)

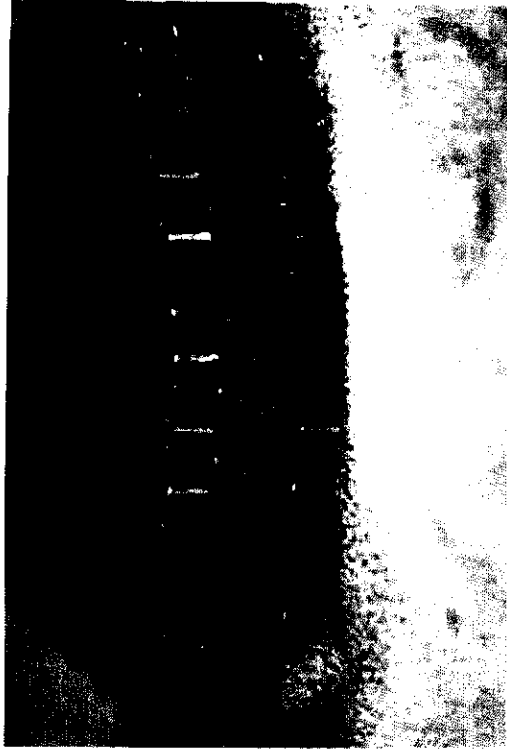


swiss ETA replica watches

Page 2 of 4

<http://pilotwatch.net/Rolox.asp?pro=40&c=>

7/22/2009



\$225.00  Add to Cart

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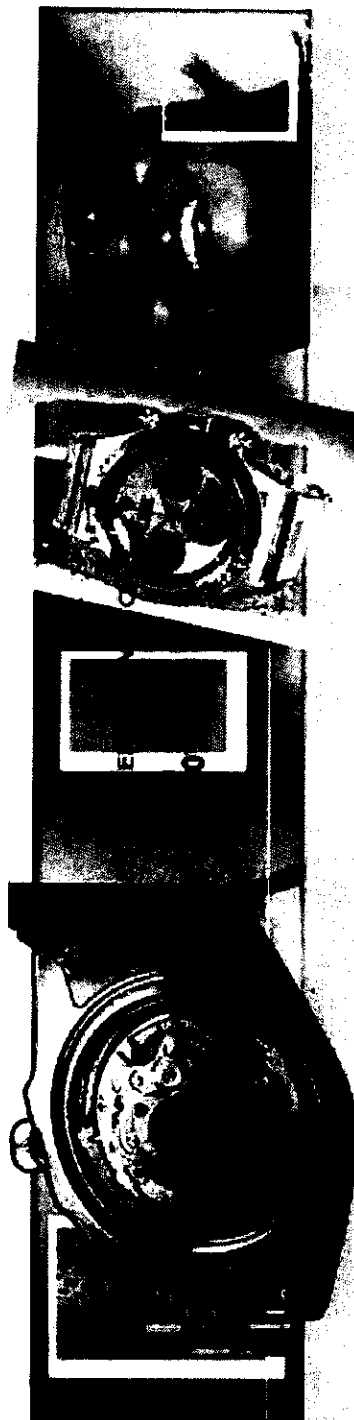
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Rolex datejust (black) : \$225.00

New unisex 38mm stainless steel, Swiss made 25 Jewels reliable automatic self-winding ETA 2836 movement, Chronograph, Sapphire crystal face, water resistant, Laser etched crown on 6 o'clock, sweep second hand, screws on band not pins.

High quality SWISS ETA automatic movement.

\* Stop second hand \*

\* 25 jewelries \*

\* Power reserved 38 hours \*

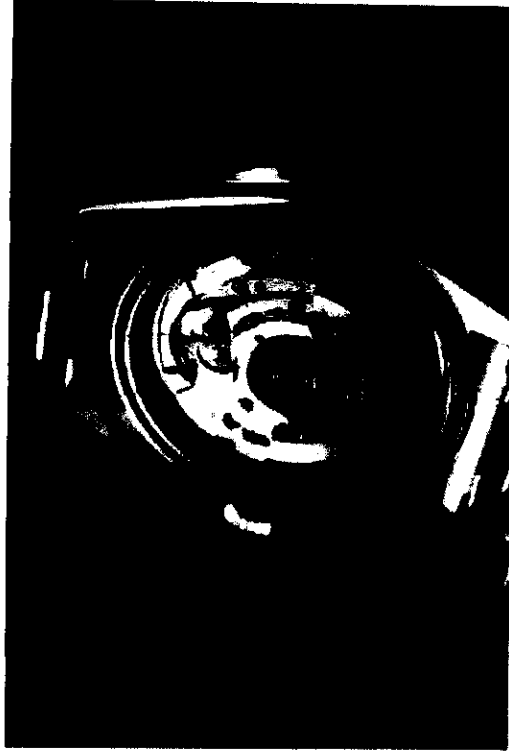
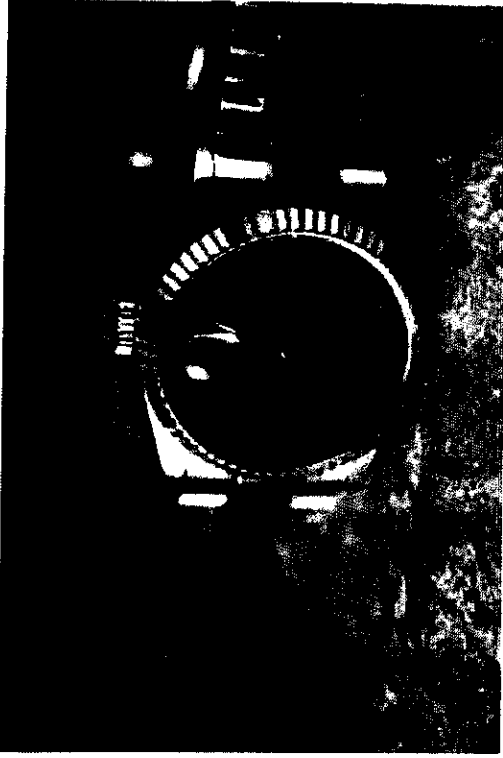
\* Frequency 28800 A/H \*

\* Smooth sweeping second hand \*

\* Momentary Date change\*



[click to enlarge](#)



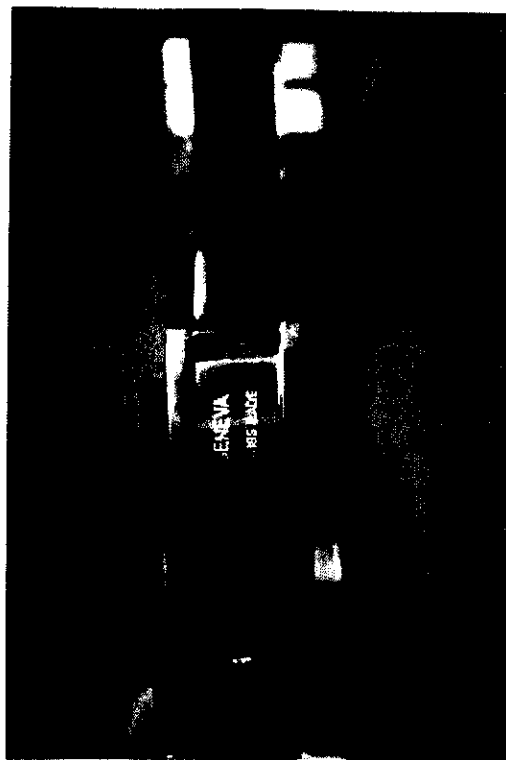
swiss ETA replica watches

Page 3 of 4



<http://pilottwatch.net/Rolex.asp?pro=38&c=>

7/22/2009



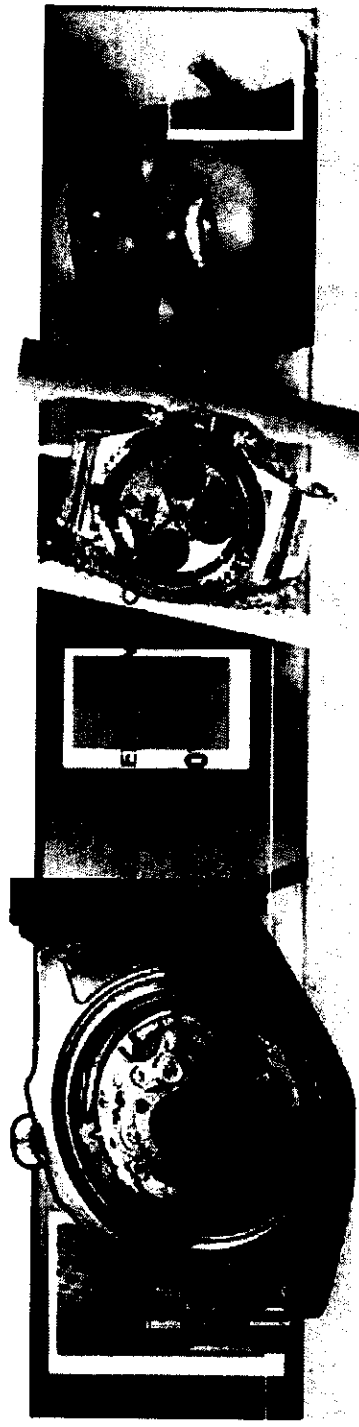
\$225.00  Add to Cart

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Pilotwatch Inc.  
pilotwatch@yahoo.com

Full Name :	<input type="text"/>
Company Name :	<input type="text"/>
Address :	<input type="text"/>
City :	<input type="text"/>
State/Province :	<input type="text"/>
Zip/Postal Code :	<input type="text"/>
Country :	<input type="text"/>

Phone Number :

Fax Number :

Email :

Questions/Comments :

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Vendor by Mail  
ISP DMCA letter



Contact:

[pilottwatch@yahoo.com](mailto:pilottwatch@yahoo.com)  
[support@abihosting.com](mailto:support@abihosting.com)  
[ipadmin@coreexpress.net](mailto:ipadmin@coreexpress.net)

Google

## PilotTwatch.net Whois Record ( Pilot Twatch )

**For Sale:** [LightPilot.com](#) (\$1,580.00) | [BeautyPilot.com](#) (\$628.00) | [CaliforniaPilot.com](#) (\$488.00) | [PilotCountry.com](#) (\$1,500.00) | [More](#)

### Front Page Information

**Add Missing Thumbnail:**



**Website Title:** [swiss ETA replica watches](#)

**Title Relevancy** 75%

**Meta Description:** swiss ETA replica rolex , omega

**Relevancy:** 60% relevant.

**Meta Keywords:** the best replica rolex fake watches  
online shop at [www.pilottwatch.net](#),  
including some of the world-famous  
brand watches swiss rolex watch, replica  
omega, replica

**Relevancy:** 0% relevant

**SEO Score:** 63%

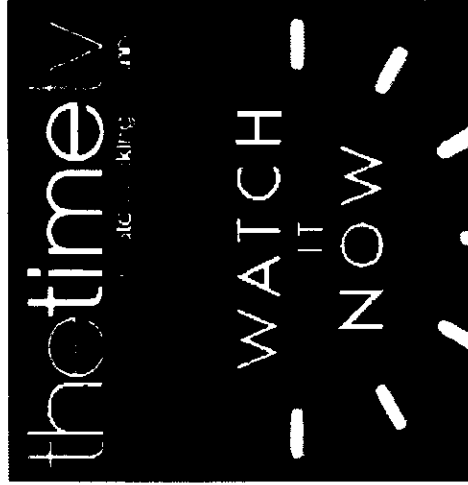
**Terms:** 137 (Unique: 74, Linked: 87)

**Images:** 27 (Alt tags missing: 27)

**Links:** 15 (Internal: 14, Outbound: 1)

**AboutUs:**  [Wiki article on Pilottwatch.net](#)

[Queue Thumbnail For Addition](#)



## Registry Data

**ICANN Registrar:** ENOM, INC.

**Created:** 2009-06-16

**Expires:** 2010-06-16

**Updated:** 2009-06-16

**Registrar Status:** [clientTransferProhibited](#)

**Name Server:** [NS1.ABIWEBHOST.COM](#) (has [21 domains](#))

**Name Server:** [NS2.ABIWEBHOST.COM](#) (has [21 domains](#))

**Whois Server:** [whois.enom.com](#)

## Server Data

**Server Type:** Microsoft-IIS/6.0

**IP Address:** [64.69.34.106](#) [Whois](#) | [Reverse-IP](#) | [Ping](#) |

[DNS Lookup](#) | [Traceroute](#)

**IP Location**  - California - Los Angeles -  
Coreexpress

## SEO Text Browser

SEO Text Browser

Home>About UsStore policySWISS ETA WatchesC

Chanel J12 ceramic Panerai 1950 8 Role:

42mm-chronometer days GMT (paul

(black)-diamond (Availability: (Avai

(Availability: In In Stock) click to In St

Stock) click to BRAND enlarge

Japan made enlarge NEW rol

reliable LUMINOR vin

Quartz Fully PANERAI sty

chronometer WATCH | A

movement | Add to \$225.00 to

| Add to \$225.00 Cart |

Cart |

swiss ETA movment

High quality SWISS ETA 2836 automatic mov

\* Stop second hand \*

[http://www.pilottwatch.net](#)

**Response Code:** 200

**Domain Status:** Registered And Active Website

**DomainTools Exclusive**

**Email Search:** [support@abihosting.com](mailto:support@abihosting.com) is associated with about 125 domains


**Registrar History:** 1 registrar

**NS History:** 1 change on 2 unique name servers over 0 year.

**IP History:** 1 change on 2 unique name servers over 0 years.

**Whois History:** 2 records have been archived since 2009-06-17.

**Reverse IP:** 16 other sites hosted on this server.

**Monitor Domain:**  Set Free Alerts on [pilottwatch.net](http://pilottwatch.net)

**Free Tool:**  **Download DomainTools for Windows**

**Whois Record**

Registration Service Provided By: ABI Hosting  
Contact: [support@abihosting.com](mailto:support@abihosting.com)

Domain name: [pilottwatch.net](http://pilottwatch.net)

Registrant Contact:  
[pilottwatch@abihosting.com](mailto:pilottwatch@abihosting.com)  
gary lok ( )

Fax:  
106 mott  
Newyork, NY 10013  
US

Administrative Contact:  
ABI Hosting  
Roger Schnur ( [support@abihosting.com](mailto:support@abihosting.com) )  
+1.2017992606

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**Other TLDs**

[.com](#) [.net](#) [.org](#) [.biz](#) [.info](#) [.us](#)

**Symbol Key**

[Show Key](#)

**Domains for Sale**

Domain	Price
<a href="#">BigPilot.com</a>	\$1,500.00
<a href="#">MobilePilot.com</a>	\$200.00
<a href="#">PerfectPilot.com</a>	\$180.00
<a href="#">BeautyPilot.com</a>	\$628.00
<a href="#">GoldPilot.com</a>	\$1,900.00
<a href="#">LightPilot.com</a>	\$1,580.00
<a href="#">PilotCountry.com</a>	\$1,500.00
<a href="#">PilotLake.com</a>	\$688.00
<a href="#">PilotSport.com</a>	\$1,250.00
<a href="#">CaliforniaPilot.com</a>	\$488.00
<a href="#">PilotLibrary.com</a>	\$400.00

Vendor by mail sent to:  
[pilottwatch@yahoo.com](mailto:pilottwatch@yahoo.com)  
[support@abihosting.com](mailto:support@abihosting.com)

**Domains At Auction**

Domain	Auction Date
<a href="#">OilPilot.com</a>	07-24-2009
<a href="#">EvaPilot.com</a>	07-24-2009
<a href="#">FlierPrinting.com</a>	07-24-2009
<a href="#">RyanThePilot.com</a>	07-24-2009
<a href="#">ElectricPilotStore.com</a>	07-24-2009
<a href="#">OcPilot.net</a>	07-24-2009

**Compare Similar Domains**

Fax: +.  
239 Old Tappan Rd  
Old Tappan, NJ 07675  
US

Technical Contact:  
ABI Hosting  
Roger Schnur ( [support@abihosting.com](mailto:support@abihosting.com) )  
+1.2017992606

Fax: +.  
239 Old Tappan Rd  
Old Tappan, NJ 07675  
US

Status: Locked

Name Servers:  
ns1.abiwebhost.com  
ns2.abiwebhost.com

Creation date: 16 Jun 2009 12:33:29  
Expiration date: 16 Jun 2010 12:33:29

Domain	Created
<a href="#">Pilo</a>	1998-11-04
<a href="#">Pilo - Productions</a>	2000-11-24
<a href="#">Pil NY</a>	2002-04-04
<a href="#">Pilo - Watches</a>	2002-05-09
<a href="#">Pil Ny Pines</a>	2002-09-14
<a href="#">Pilo - Hygiene</a>	2004-01-02
<a href="#">Pilo - Sex</a>	2004-12-18
<a href="#">Pi Loan</a>	2006-02-16
<a href="#">Pilo - Tee</a>	2006-05-31
<a href="#">Pil No</a>	2006-06-04
<a href="#">Pil Ns Ner Ur Quel</a>	2006-07-27
<a href="#">Pi Ln School</a>	2006-08-17
<a href="#">Pi Ln Ser Urquell</a>	2006-09-03
<a href="#">Pi Ln K World</a>	2006-12-01
<a href="#">Pi Load</a>	2007-01-26

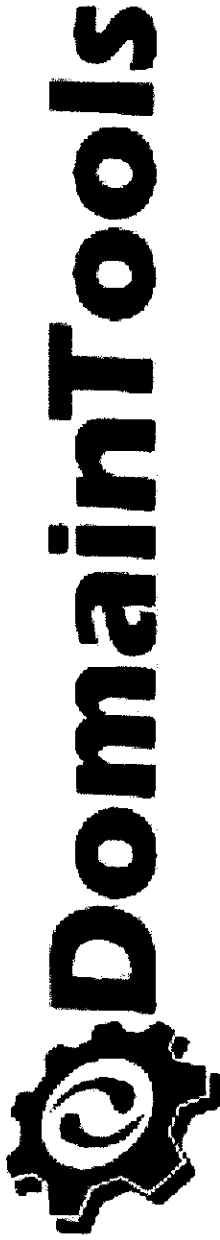
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- ☒ Server Data ☒ Registry Data
- ☒ Exclusive Data ☒ Whois Record

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### IP Information for 64.69.34.106

**IP Location:**  United States Los Angeles Coreexpress

**Resolve Host:** [unassigned.calpop.com](#)

**IP Address:** 64.69.34.106

**SSL Cert:** [www.abiwebhost.com](#) SSL Certificate has expired.

**Reverse IP:** 16 other sites hosted on this server.

**Blacklist Status:** Clear

ISP DMCA letter sent to:

#### Whois Record

**OrgName:** CoreExpress  
**OrgID:** COEX  
**Address:** 600 W. 7th Street  
**Address:** Suite 360  
**City:** Los Angeles  
**StateProv:** CA  
**PostalCode:** 90017  
**Country:** US

**NetRange:** 64.69.32.0 - 64.69.47.255  
**CIDR:** 64.69.32.0/20  
**NetName:** COREEXPRESS-BLK-1  
**NetHandle:** NET-64-69-32-0-1  
**Parent:** NET-64-0-0-0-0  
**NetType:** Direct Allocation  
**NameServer:** NS1.CALPOP.COM  
**NameServer:** NS2.CALPOP.COM  
**Comment:** ADDRESSES WITHIN THIS BLOCK ARE NON-PORTABLE  
**RegDate:** 2000-04-11  
**Updated:** 2004-08-06

**RNOCHandle:** ZC46-ARIN  
**RNOCHandle:** ipadmin  
**RNOCHandle:** +1-213-627-1937  
**RNOCHandle:** ipadmin@coreexpress.net

**RTechHandle:** ZC46-ARIN  
**RTechHandle:** ipadmin  
**RTechHandle:** +1-213-627-1937  
**RTechHandle:** ipadmin@coreexpress.net

**OrgTechHandle:** ZC46-ARIN  
**OrgTechHandle:** ipadmin  
**OrgTechHandle:** +1-213-627-1937  
**OrgTechHandle:** ipadmin@coreexpress.net



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United States  
**Email:** vjbustos@hotmail.com

**Ship From:** Chou w Lok  
**Address:** 1527 w 11 st. Apt 1F  
Brooklyn, NY 11204  
United States  
**Email:** evawatch74@yahoo.com

**Transaction ID:** 3ST8578835734774U

Description	Options	Qty	Price
Products are---1.Rolex datejust(blue),		1	\$199.00 USD
Shipping & Handling:			\$0.00 USD
<b>Total:</b>			<b>\$199.00 USD</b>
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 DALLAS-TEXAS 75206  
 UNITED STATES**

Label 228, January 2009





**GIBNEY  
ANTHONY &  
FLAHERTY** LLP

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www.gibney.com

John Macaluso  
jmacaluso@gibney.com

September 30, 2009

**BY EMAIL: dns@abihosting.com, pilottwatch@yahoo.com**  
**AND FIRST CLASS MAIL**

Gary Lok  
106 Mott  
New York, NY 10013

**RE: ROLEX WATCH U.S.A., INC.**  
**TRADEMARK INFRINGEMENT: PILOTTWATCH.NET**

Dear Mr. Lok:

This firm is general counsel to Rolex Watch U.S.A. Inc. ("Rolex"), the owners of the federally registered Rolex Trademarks: ROLEX, PRESIDENT, SUBMARINER, YACHT-MASTER, DAYTONA, GMT-MASTER, DATEJUST and Crown Device (among others) (the "Rolex Trademarks").

**We are writing to demand that you immediately cease the sale of counterfeit Rolex watches in order to avoid legal action by Rolex.**

It has come to Rolex's attention that you are offering for sale and selling watches bearing one or more Rolex Trademarks (or bearing marks substantially indistinguishable thereto) through the website **pilottwatch.net** and that this merchandise is COUNTERFEIT.

Such use is likely to cause confusion and constitutes counterfeiting, trademark infringement and dilution of Rolex's intellectual property rights in violation of both federal and state laws. As a result of your conduct, you may be held liable for trademark counterfeiting and infringement. The penalties for such conduct are severe and may include injunctive relief, actual damages, statutory damages of up to \$2,000,000 for each trademark that has been counterfeited, costs and attorneys' fees.

San Francisco Office: Two Transamerica Center, 505 Sansome Street, Suite 1200, San Francisco, CA 94111 tel 415.901.2270

Associated Offices: Gros & Waltenspuhl, Rue Beauregard 9, CH-1204 Geneva, Switzerland tel +41 22.311.3833  
Magrath LLP, 66/67 Newman Street, London, W1T 3EQ, United Kingdom tel +44 207.495.3003



GIBNEY ANTHONY & FLAHERTY<sup>LLP</sup>

In order to avoid legal proceedings, we must receive your written assurances by **October 7, 2009**, that you have already removed all web page content relating to the unlawful use of the Rolex Trademarks from this website, including the corresponding metatags, HTML, etc. In addition, we ask that you provide us with the following:

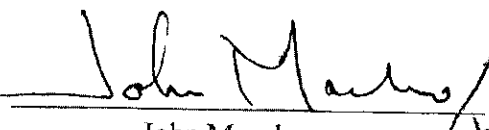
1. All counterfeit Rolex watches and any merchandise bearing any of the Rolex Trademarks presently in you possession or control.
2. A representation that any merchandise bearing marks substantially indistinguishable or identical to the Rolex Trademarks has been withdrawn from sale.
3. The identity of your supplier for the counterfeit Rolex watches.
4. A full accounting of all sales and profits earned from the sale of counterfeit Rolex products; and
5. A written guarantee to the undersigned that your illegal activities have been discontinued and will not resume any time in the future.

Please be advised that your failure to respond or to comply with these demands will result in Rolex taking legal action to enforce its rights. You are also hereby advised that your Internet Service Provider has been notified of this serious matter.

We await a response from you or your counsel.

Sincerely,

Gibney, Anthony & Flaherty, LLP

By:   
John Macaluso 